

Complaint

120 F.T.C.

IN THE MATTER OF

NATURE'S BOUNTY, INC., ET AL.

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF
SECS. 5 AND 12 OF THE FEDERAL TRADE COMMISSION ACT

Docket C-3593. Complaint, July 21, 1995--Decision, July 21, 1995

This consent order requires, among other things, the New York-based company and two of its wholly-owned subsidiaries to pay \$250,000 to the Commission for possible use for consumer redress, and requires them to have substantiation for specific health-related representations they make in advertising and promoting any product in the future.

Appearances

For the Commission: *Justin Dingfelder, Peter Metrisko, Rose Toufexis and Jonathan Cowen.*

For the respondents: *Michael F. Brockmeyer, Piper & Marbury, Baltimore, MD.*

COMPLAINT

The Federal Trade Commission, having reason to believe that Nature's Bounty, Inc., a corporation, Puritan's Pride, Inc., a corporation, and Vitamin World, Inc., a corporation, ("respondents"), have violated Sections 5(a) and 12 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. 45(a) and 52, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

PARAGRAPH 1. A. Respondent Nature's Bounty, Inc. ("Nature's Bounty"), is a Delaware corporation, with its office and principal place of business at 90 Orville Dr., Bohemia, NY.

B. Respondent Puritan's Pride, Inc. ("Puritan's Pride"), is a Delaware corporation with its office and principal place of business at 90 Orville Dr., Bohemia, NY. Puritan's Pride is a wholly-owned subsidiary of Nature's Bounty.

C. Respondent Vitamin World, Inc. ("Vitamin World"), is a Delaware corporation with its office and principal place of business

Exhibit A

at 90
subsi
D
Pride
alleg

P.
sale,
Diet,
"Pros
"New
"Gluc
Vites
Cellu
Tea,"
Steroi
Table
"drug
P.
comp
defin
P.
disse
produ
limite
conta

A
weigh
amino
B
(huma
neede
... sti
decrea
C
amino
(Ex. F
increa
D
of age
urinati

120 F.T.C.

206

Complaint

at 90 Orville Dr., Bohemia, NY. Vitamin World is a wholly-owned subsidiary of Nature's Bounty.

D. Nature's Bounty directs or controls its subsidiaries Puritan's Pride and Vitamin World in carrying out the acts and practices alleged in this complaint.

TION OF
N ACT

1, 1995

1 company and
ommission for
stantiation for
and promoting

trinko, Rose

& Marbury,

believe that
ide, Inc., a
spondents"),
Commission
earing to the
ould be in the

nc. ("Nature's
and principal

Pride"), is a
e of business
holly-owned

World"), is a
e of business

PAR. 2. Respondents have manufactured, advertised, offered for sale, sold or distributed a variety of products, including "Sleeper's Diet," "L-Arginine 500 mg. tablets," "L-Ornithine 500 mg. tablets," "Prostex," "L-Cysteine," "L-Lysine," "L-Methionine," "Octacosanol," "New Zealand Green Lipped Mussel Extract," "KLB6," "Glucomannan," "Sugar Blocker," "Spirulina 500 mg. tablets," "Eye-Vites" (also sold as CATA-RX), "KLB6 Grapefruit Diet," "Herbal Cellulex Formula," "Memory Booster," "Ginsana," "Fatbuster Diet Tea," "Shake-A-Weigh," "Dark Circle Eye Treatment," "Natural Sterol Complex," "Super Fat Burners," "Super Cut," "Papaya Enzyme Tablets," and "Calmtabs." Each of these products is a "food" and/or "drug" within the meaning of Sections 12 and 15 of the FTC Act.

PAR. 3. The acts and practices of respondents alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act.

PAR. 4. Respondents have disseminated or have caused to be disseminated advertisements and promotional materials for the products referred to in paragraph two, including, but not necessarily limited to, the attached Exhibits ("Ex.") A-R. These advertisements contain the following statements:

A. In regard to Sleeper's Diet: "SLEEPER'S DIET . . . Based on a popular weight loss program. Dieters will be interested in this special combination of amino acids." (Ex. A)

B. In regard to L-Arginine: (1) "L-Arginine stimulates the release of HGH (human growth hormone). HGH . . . promotes the formation of DNA and RNA needed to increase muscle mass and decrease body fat." (Ex. B) (2) "L-ARGININE . . . stimulates the release of growth hormone . . . [I]ncreases muscle mass while decreasing the amount of body fat." (Ex. C)

C. In regard to L-Ornithine: (1) "L-ORNITHINE . . . As with L-Arginine this amino acid releases HGH. However, L-Ornithine is said to be twice as effective." (Ex. B) (2) "L-ORNITHINE stimulates the release of growth hormone which increases muscle mass while decreasing the amount of body fat." (Ex. C)

D. In regard to Prostex: "PROSTEX Can Help You! If you are over 50 years of age and Benign Prostatic Hypertrophy is causing these discomforts: Frequent urination. Painful Urination. Urgency to urinate. Dribbling. Distended bladder due

Complaint

120 F.T.C.

to incomplete emptying. Sleepless nights caused by night time urination. Developed by a doctor - Prostex is a scientific combination of 3 pure amino acids in capsule form. It is safe, natural and effective . . . to relieve the symptoms of Benign Prostatic Hypertrophy." (Ex. D)

E. In regard to L-Cysteine: (1) "L-CYSTEINE found to increase hair growth by as much as 100%." (Ex. C)(2) "[E]ffective in preventing not only hangovers but brain and liver damage from alcohol." (Ex. C) (3)[H]elps prevent damages from the ill effects of cigarette smoke." (Ex. C)

F. In regard to L-Lysine: "L-LYSINE . . . produces L-Carnitine which improves stress tolerance . . . and has an anti-fatigue effect." (Ex. C)

G. In regard to L-Methionine: "L-METHIONINE . . . helps prevent premature hair loss." (Ex. C)

H. In regard to Octacosanol: "Increase Stamina, Vigor and Endurance. OCTACOSANOL . . . In fact, a recent study at the University of Illinois has shown that Octacosanol may speed reaction time, lower cholesterol levels and strengthen muscles (including the heart)." (Ex. D)

I. In regard to New Zealand Green Lipped Mussel Extract: "NEW ZEALAND GREEN LIPPED MUSSEL EXTRACT. It has been shown in recent studies that Green Lipped Mussel not only relieves the symptoms of arthritis, but works on the cause. For relief of one of the most painful and discomforting ailments, try Puritan's Pride Green Lipped Mussel today!" (Ex. E)

J. In regard to KLB6: "Losing weight is easy the KLB6 way. The original natural fat fighting plan that helps put you in shape. KLB6 Kelp, Lecithin, Vitamin B-6 and Cider Vinegar, all-in-one capsule. KELP - a natural food rich in iodine. It works to maintain a healthy thyroid. And, of course, a sluggish metabolism is an enemy to anyone wishing to shed a few pounds. LECITHIN . . . is of special interest if you're concerned about weight reduction. It is a lipotropic agent that disperses fat globules in the body and also appears to be involved in keeping down the cholesterol level." (Ex. F)

K. In regard to Glucomannan: "GLUCOMANNAN . . . Feel Full, Satisfied and Eat Less . . . Glucomannan helps your body to process your food easier and faster. Therefore many of the calories you do take in pass through your digestive tract undigested without adding inches to your waistline. Helps you lose weight without harmful drugs, chemicals or stimulants." (Ex. G)

L. In regard to Sugar Blocker: "Stop Sugar Calories before they make it to your waistline. SUGAR BLOCKER. New Sugar Blocker contains the herb Gymnema Sylvestre which helps to impede the absorption of some of the sugar you eat . . . When taken before a meal, Sugar Blocker occupies the same sites in the small intestine where sugar is absorbed. With these sites blocked, the sugar passes through your system, greatly reducing assimilation by the body." (Ex. H)

M. In regard to Spirulina 500 mg. tablets: "Diet without hunger . . . the natural way. SPIRULINA . . . People are reporting fast weight loss of 20 pounds and more . . . without hunger! . . . Taken before meals it helps turn off your brain's hunger center. It cuts your drive to eat, so you stick to your diet." (Ex. I)

N. In regard to Eye-Vites, also sold as CATA-RX: "EYE-VITES Tablet. A Nutritional Breakthrough in Cataracts Prevention . . . [N]ow, thanks to the efforts of a group of dedicated vision scientists, there's Eye-Vites . . . the nutritional approach to the prevention of age related cataracts. The potent anti-oxidants and

206

micronutrients in Research has prov likely to develop

O. In regard Puritan's Pride br weight. You get ti so you can burn ca metabolism and su

P. In regard to . . . Millions of die herbal diet weight Vinegar 'fat fighte

Q. In regard i Sharpen Your Mi Pride combines th memory retention

R. In regard i Build Physical En shown that endura users." (Ex. L)

S. In regard FATBUSTER DIE you shed unwanted of herbs filters thrc (Ex. F)

T. In regard to seasoning contain through your diges

U. In regard to longer any eviden DARK CIRCLE E Dark Circle Eye Ti dark circles from t

V. In regard to FORMULA. NA ENHANCER . . . bodybuilders train strength, you need Complex by Unive today for anyone l Massive arms. Ro your body, nothing (Ex. N)

W. In regard i Burners contains a needed for the redu ability to burn fat,

ght time urination.
3 pure amino acids
ve the symptoms of

ncrease hair growth
t only hangovers but
nt damages from the

L-Carnitine which
(Ex. C)
s prevent premature

or and Endurance.
of Illinois has shown
evels and strengthen

: "NEW ZEALAND
n recent studies that
tis, but works on the
orting ailments, try

6 way. The original
p, Lecithin, Vitamin
food rich in iodine.
ish metabolism is an
IN . . . is of special
lipotropic agent that
ved in keeping down

el Full, Satisfied and
ood easier and faster.
your digestive tract
lose weight without

they make it to your
s the herb Gymnema
he sugar you eat . . .
ie sites in the small
ed, the sugar passes
dy." (Ex. H)

unger . . . the natural
20 pounds and more
your brain's hunger
(Ex. I)

E-VITES Tablet. A
thanks to the efforts
. . . the nutritional
nt anti-oxidants and

miconutrients in Eye-Vites combine to help prevent the formation of cataracts. Research has proven that patients undergoing anti-oxidant therapy were 70% less likely to develop cataracts." (Ex. J)

O. In regard to KLB6 Grapefruit Diet: "KLB6 GRAPEFRUIT DIET . . . Puritan's Pride brings you the ultimate grapefruit diet formula to help you lose weight. You get the famous KLB6 combination that helps keep your body active so you can burn calories. Grapefruit extract works as a 'fat melter' to stimulate your metabolism and suppress the appetite." (Ex. K)

P. In regard to Herbal Cellulex Formula: "HERBAL CELLULEX FORMULA . . . Millions of dieters have used this unique herbal-vitamin formula as part of their herbal diet weight loss plan . . . You also get the famous Kelp, Lecithin and Cider Vinegar 'fat fighters' plus 6 herbal extracts." (Ex. F)

Q. In regard to Memory Booster: "An Exciting Blend of Nutrients to Help Sharpen Your Mind. MEMORY BOOSTER. Memory Booster from Puritan's Pride combines these special natural ingredients to work together as an aid to memory retention and mental alertness." (Ex. J)

R. In regard to Ginsana: "GINSANA. Concentrated Herbal Extract Helps Build Physical Endurance and Mental Alertness. Years of research studies have shown that endurance [and] mental alertness . . . were improved among Ginsana users." (Ex. L)

S. In regard to Fatbuster Diet Tea: "Lose weight naturally with . . . FATBUSTER DIET TEA . . . The result is a flavorful beverage that actually helps you shed unwanted pounds! When taken after every meal, the special combination of herbs filters through fatty substances, aiding your body in eliminating them . . ." (Ex. F)

T. In regard to Shake-A-Weigh: "SHAKE-A-WEIGH . . . This great tasting seasoning contains . . . Pantothenic Acid (B5) which helps food to pass rapidly through your digestive tract allowing less time to absorb calories." (Ex. G)

U. In regard to Dark Circle Eye Treatment: "This photo shows how there is no longer any evidence of dark circles after only one application on her left eye. DARK CIRCLE EYE TREATMENT. Makes Your Dark Circles Disappear . . . Dark Circle Eye Treatment is a new beauty discovery that therapeutically removes dark circles from the delicate area under your eyes in 2 easy steps." (Ex. M)

V. In regard to Natural Sterol Complex: "ADVANCED MUSCLE BUILDING FORMULA. NATURAL STEROL COMPLEX. MASS AND DENSITY ENHANCER . . . To maximize gains in muscle mass and strength, world-class bodybuilders train with Natural Sterol Complex . . . For serious growth in mass and strength, you need real power. And nothing powerizes you like Natural Sterol Complex by Universal. It's the most advanced, anabolic-strength formula available today for anyone looking to build a huge, massive and awe-inspiring body . . . Massive arms. Rock-hard shoulders. Awesome legs. Chiseled abs. For building your body, nothing even comes close to the power of Natural Sterol Complex." (Ex. N)

W. In regard to Super Fat Burners: "SUPER FAT BURNERS. Super Fat Burners contains a special combination of vitamins, minerals and amino acids needed for the reduction of fat cells. The ingredients in this formula help the body's ability to burn fat, thereby promoting visible muscle definition." (Ex. O)

X. In regard to Super Cut: "SUPER CUT . . . The ingredients in this formula help the body's ability to burn fat, thereby promoting visible muscle definition." (Ex. P)

Y. In regard to Papaya Enzyme Tablets: "PAPAYA ENZYME Tablets. An aid to better digestion from papaya . . . [C]ontains the enzyme Papain which helps you digest protein and helps release the nutritional potency of your foods and also promotes comfortable natural digestive processes." (Ex. Q)

Z. In regard to Calmtabs: "CALMTABS. All Natural Non-Habit Forming Herbal Relaxant. Puritan's Pride Calmtabs offers you a gentle and safe way to relax especially when everyday stress winds you up. This special formulation gives you six different herbs known for their calmativ properties . . . You can enjoy Calmtabs' soothing, calm effect anytime during the day or before bedtime." (Ex. R)

PAR. 5. Through the use of the statements contained in the advertisements and promotional materials referred to in paragraph four, including but not necessarily limited to the attached Exhibits A-R, respondents have represented, directly or by implication, that:

A. Sleeper's Diet promotes weight loss during sleep.

B. L-Arginine stimulates the release of human growth hormone which increases muscle mass while decreasing body fat.

C. L-Ornithine stimulates the release of human growth hormone which increases muscle mass while decreasing body fat.

D. Prostex relieves the symptoms of benign prostatic hypertrophy.

E. L-Cysteine (1) increases hair growth, (2) prevents hangovers and brain and liver damage from alcohol, and (3) helps prevent harm caused by cigarette smoke.

F. L-Lysine improves stress tolerance and reduces fatigue.

G. L-Methionine prevents premature hair loss.

H. Octacosanol increases stamina, vigor, and endurance, improves reaction time, lowers cholesterol levels and strengthens muscles.

I. New Zealand Green Lipped Mussel Extract prevents arthritis and relieves its symptoms.

J. KLB6 causes weight loss and reduces cholesterol levels.

K. Glucomannan causes weight loss by suppressing appetite and allowing calories to pass through the body undigested.

L. Sugar Blocker prevents weight gain by impeding the body's absorption of sugar.

M. Spirulina 500 mg. tablets suppress the appetite, enabling adherence to a diet.

N. K
metaboli

O. H
body fat.

P. M
alertness

Q. G
R. F

substance

S. Sh
food.

T. D
the eyes.

U. N
improve

V. S
definitio

W. S
definitio

X. P
absorptio

Y. C

PAR. 6.

A. S
B. L

hormone

C. L
hormone

D. L

E. L

Therefor
and E(1)

PAR
advertis

four, inc
R, respc
the time

206

Complaint

N. KLB6 Grapefruit Diet causes weight loss by stimulating metabolism and suppressing appetite.

O. Herbal Cellulex Formula causes weight loss by eliminating body fat.

P. Memory Booster improves memory retention and mental alertness.

Q. Ginsana helps build physical endurance and mental alertness.

R. Fatbuster Diet Tea causes weight loss by eliminating fatty substances from the body.

S. Shake-A-Weigh reduces the body's absorption of calories from food.

T. Dark Circle Eye Treatment removes dark circles from under the eyes.

U. Natural Sterol Complex promotes growth in muscle mass and improves strength.

V. Super Fat Burners reduces body fat, thereby promoting muscle definition.

W. Super Cut reduces body fat, thereby promoting muscle definition.

X. Papaya Enzyme Tablets aid digestion and promote greater absorption of nutrients from food.

Y. Calmtabs relieves stress and promotes relaxation.

PAR. 6. In truth and in fact:

A. Sleeper's Diet does not promote weight loss.

B. L-Arginine does not stimulate the release of human growth hormone so as to increase muscle mass while decreasing body fat.

C. L-Ornithine does not stimulate the release of human growth hormone so as to increase muscle mass while decreasing body fat.

D. L-Cysteine does not promote hair growth.

E. L-Methionine does not prevent premature hair loss.

Therefore the representations set forth in paragraph five A, B, C, G, and E(1) were, and are, false and misleading.

PAR. 7. Through the use of the statements contained in the advertisements and promotional materials referred to in paragraph four, including but not necessarily limited to the attached Exhibits A-R, respondents have represented, directly or by implication, that at the time they made the representations set forth in paragraph five A-

Y, respondents possessed and relied upon a reasonable basis that substantiated such representations.

PAR. 8. In truth and in fact, at the time they made the representations set forth in paragraph five A-Y, respondents did not possess and rely upon a reasonable basis that substantiated such representations. Therefore, the representation set forth in paragraph seven was, and is, false and misleading.

PAR. 9. Through the use of the statements contained in certain advertisements and promotional materials set forth in paragraph four, including but not necessarily limited to the advertisements and promotional materials attached as Exhibits D, E, J, and L, respondents have represented, directly or by implication, that scientific research, including scientific papers and/or studies, prove that:

1. Octacosanol may improve reaction time, lower cholesterol levels and strengthen muscles.
2. New Zealand Green Lipped Mussel Extract prevents arthritis and relieves its symptoms.
3. As to Eye-Vites, also sold as CATA-RX, patients undergoing anti-oxidant therapy such as that provided by Eye-Vites and CATA-RX are 70% less likely to develop cataracts.
4. Ginsana improves physical endurance and mental alertness.

PAR. 10. In truth and in fact, at the time respondents made the representations set forth in paragraph nine, scientific research, including scientific papers and/or studies, did not prove that (1) Octacosanol may improve reaction time, lower cholesterol levels and strengthen muscles, (2) New Zealand Green Lipped Mussel Extract prevents arthritis and relieves its symptoms, (3) patients undergoing anti-oxidant therapy such as that provided by Eye-Vites and CATA-RX are 70% less likely to develop cataracts, and (4) Ginsana improves physical endurance and mental alertness. Therefore, the representations set forth in paragraph nine were, and are, false and misleading.

PAR. 11. Through the use of the trade names set forth in this paragraph, including but not necessarily limited to their uses in the advertisements and promotional materials attached as Exhibits A, J, M, and O referred to in paragraph four, respondents have represented, directly or by implication, that:

reasonable basis that
ime they made the
, respondents did not
at substantiated such
set forth in paragraph

s contained in certain
orth in paragraph four,
: advertisements and
s D, E, J, and L,
by implication, that
and/or studies, prove

ne, lower cholesterol

tract prevents arthritis

ζ, patients undergoing
Eye-Vites and CATA-

and mental alertness.

respondents made the
e, scientific research,
lid not prove that (1)
r cholesterol levels and
Lipped Mussel Extract
3) patients undergoing
Eye-Vites and CATA-
acts, and (4) Ginsana
rtness. Therefore, the
ere, and are, false and

names set forth in this
ited to their uses in the
ached as Exhibits A, J,
dents have represented,

1. "Sleeper's Diet" promotes weight loss during sleep.
2. "Memory Booster" improves memory retention.
3. "Dark Circle Eye Treatment" removes dark circles from under the eyes.
4. "Super Fat Burners" reduces body fat.

PAR. 12. In making the representations referred to in paragraph eleven, respondents have represented, directly or by implication, that at the time they made these representations they possessed and relied upon a reasonable basis that substantiated such representations.

PAR. 13. In truth and in fact, at the time respondents made the representations set forth in paragraph eleven, they did not possess and rely upon a reasonable basis that substantiated such representations. Therefore, the representation set forth in paragraph twelve was, and is, false and misleading.

PAR. 14. The acts and practices of respondents as alleged in this complaint constitute unfair or deceptive acts or practices and the making of false advertisements in or affecting commerce in violation of Sections 5(a) and 12 of the FTC Act.

EXHIBIT A

Is it really possible to lose weight while you still eat most of your favorite foods?

Yes!

FIBER DIET lets you do it!**

Fiber Diet is an all natural food supplement that helps you lose weight while improving your diet. It helps you look and feel great. Here's how it works... Fiber Diet is a special combination of grain and fruit fiber. Recent medical research confirms that a high fiber diet is healthier and an effective, natural way to lose weight and keep it OFF! You simply take Fiber Diet tablets with water 15-30 minutes before you eat. You can eat what you want, but it is always sensible to avoid highly processed food, sugar or fat. Fiber Diet absorbs water to give you a full feeling and cut your hunger so you naturally eat less, and so, you lose weight. Fiber Diet is completely free of drugs! It has no sugar, starch, preservatives or artificial colors. There is no caffeine or sodium (salt). So you can use Fiber Diet with confidence for as long as you need.



Sugar, Starch and Preservative Free

QTY.	PROD. NO.	PRICE
120	4122	6.95
250	4123	13.20
500	4125	21.95



For Dieters and Cholesterol Watchers!

Low Fat Cooking with Diet Brush**

This amazing brush has high technology polymer fibers that attract grease like a magnet, but repel other liquids. Brush it across the top of soups, stews and roasts to skim off the floating fat. Stir with it, and it removes from deep down. Wipe bacon, french fries and hamburgers to reduce fat and calories. Works better and cheaper than paper towels. Brush washes clean in sink or dishwasher.

QTY.	PROD. NO.	PRICE
1 Brush	5679	4.95

*Our special sale does not apply.

SLEEPER'S DIET**

GHF (Growth Hormone Factor)

Sugar & Starch Free

Formerly Tri-Amino Diet Supplement

Based on a popular weight loss program. Dieters will be interested in this special combination of amino acids.

QTY.	PROD. NO.	PRICE
60	3940	8.70
120	3941	15.95

Get That Full Feeling Naturally...

GUAR GUM Capsules**

It's Natural, Safe and Works Fast!

Guar Gum is the natural gel-forming fiber that many medical experts are recommending as a new, effective diet aid. It is a natural soluble fiber that comes from the guar plant, found in India and Sri Lanka. Guar Gum works because it helps to make your stomach feel full, reducing your appetite naturally. Even if you've tried other appetite suppressants before, you owe it to yourself to try Guar Gum; the one that really works.

QTY.	PROD. NO.	PRICE
100 Caps	4670	5.95

**The amount of weight you lose will depend on your body size, calorie intake and level of activity. As with starting any diet, you should first consult your physician.

84

Buy 1 Bottle GET 1 FREE (Total 2) (same item, same size)

EXHIBIT A

120 F.T.C.

206

Complaint

EXHIBIT B



r, Starch and
ervative Free

PROD. NO.	PRICE
4122	6.95
4123	13.20
4125	21.95

s!

PROD. NO.	PRICE
5679	4.95

ial sale
apply.

let Tablets

1200 mg.
900 mg.
600 mg.

PROD. NO.	PRICE
3940	8.70
3941	15.95

PROD. NO.	PRICE
4670	5.95

ure of weight you lose will
your body size, calorie intake
activity. As with starting any
and first consult your physician.

ome size)

**NATURAL (FREE FORM)
AMINO ACID TABLETS**
Sugar, Starch and Preservative Free

L-TRYPTOPHAN Tablets "NATURE'S TRANQUILIZER"

In addition to being necessary to build high quality protein L-Tryptophan has come to be known as "Nature's Tranquilizer." It is the precursor of serotonin, a chemical messenger of the brain. Serotonin has been found to be useful as an aid for relieving depression and inducing sleep.

200 mg. 500 mg. 667 mg.

QTY.	PROD. NO.	3 FOR	QTY.	PROD. NO.	3 FOR	QTY.	PROD. NO.	3 FOR
30	2110	4.80	30	3890	9.85	30	2170	11.20
100	2112	14.40	100	3892	28.35	100	2172	32.55
250	2113	33.70						

Puritan's Pride now offers you the benefit of 15 individual amino acid supplements. Each is supplied in the natural "L" form; the form utilized by your body.

QTY.	PROD. NO.	3 FOR
------	-----------	-------

L-ARGININE 500 mg. Tablets

L-Arginine stimulates the release of HGH (human growth hormone). HGH improves the body's immune systems, aids the healing process, and promotes the formation of DNA & RNA needed to increase muscle mass and decrease body fat.

50	90	8.90
----	----	------

L-ORNITHINE 500 mg. Tablets

As with L-Arginine this amino acid releases HGH. However, L-Ornithine is said to be twice as effective.

50	80	9.60
----	----	------

L-PHENYLALANINE 500 mg. Tablets

Your body uses this essential amino acid to produce the neurotransmitters responsible for your positive mood, alertness and drive.

50	150	9.60
----	-----	------

L-GLUTAMINE 500 mg. Tablets

This important amino acid is one of the few nutrients that can pass through the selective blood barrier in the brain. Once in the brain, it is broken down into glutamic acid, a potent energy source for high level brain activity.

50	3040	6.40
100	3042	11.60

L-CYSTEINE 500 mg. Tablets

Research is concentrating on this amino acid's ability to act as a detoxicant in the body. Heavy drinking and smoking produces harmful chemicals in the body which L-Cysteine can help to destroy.

50	100	10.45
----	-----	-------

L-LYSINE 500 mg. & 312 mg. Tablets

New easy-to-swallow protein-coated tablet

	500 mg.
100	3061 4.85
250	3063 10.95
500	3065 19.70

Many doctors today are recommending L-Lysine as a dietary supplement to patients who suffer from herpes.

	312 mg.
60	8148 2.35

48 Buy 1 Bottle GET 2 FREE (TOTAL 3) (same item, same size)

EXHIBIT B

EXHIBIT C

AMINO ACID GUIDE

L-ALANINE

- used as body fuel by tissues of the brain, nervous system and muscle
- important in converting energy to stored energy in the body's Krebs energy cycle
- glycogenic (energy storage source of glucose by the liver and muscles)
- important nitrogen source for post-injury states
- builds up the immune system, producing immunoglobulins and antibodies
- metabolizes sugars and organic acids

L-ARGININE

- indispensable for optimum growth
- stimulates the release of growth hormone
- important to muscle metabolism; acts as a vehicle for transport, storage and excretion of nitrogen
- increases muscle mass while decreasing the amount of body fat
- plays an important role in post-injury problems such as weight changes, nitrogen balance and tissue healing
- increases collagen, the main supportive fibrous protein found in bone, cartilage and other connective tissue
- stimulates the immune system
- combats physical and mental fatigue
- increases spermatogenesis
- used in the treatment of hepatic (liver) disorders
- transforms to L-Ornithine and urea
- promotes the detoxification of ammonia which is poisonous to living cells.

L-ASPARTIC ACID

- increases resistance to fatigue
- involved in the formation of RNA and DNA, the chemical basis of heredity and carriers of genetic information
- sets of aspartic acid increase stamina and endurance
- protects the liver and promotes normal cell function
- builds up the immune system, producing immunoglobulins and antibodies

L-CITRULLINE

- helps recovery from fatigue
- stimulates the immune system; therefore, beneficial in the presence of any illness, disease, traumatic injury or wound
- metabolizes to L-Arginine
- detoxifies ammonia which is poisonous to living cells

L-CYSTEINE

- found to increase hair growth by as much as 100%
- effective in preventing not only hangovers but brain and liver damage from alcohol
- helps prevent damage from the ill effects of cigarette smoke
- detoxifies many harmful chemicals
- helpful in the treatment of rheumatoid arthritis
- promotes healing and the immune system

L-CYSTINE

- essential for the formation of skin and hair
- promotes recovery from surgical operations and burns
- used in the treatment of respiratory disorders such as chronic bronchitis
- stimulates white blood cell activity in the immune system necessary for the resistance to disease

L-GLUTAMIC ACID

- especially important in brain metabolism
- functions as a brain fuel serving as an excitatory neurotransmitter
- transports potassium across the blood brain barrier
- combines to form L-Glutamine and in the process picks up ammonia molecules. This is the only method the brain has of detoxifying ammonia.
- neuromuscular in the metabolism of other amino acids
- metabolizes sugars and fats
- increases the blood sugar level; used in the treatment of hypoglycemia

L-GLUTAMINE

- sustains mental ability
- involved with brain metabolism
- along with L-Glutamic Acid is used as a brain fuel
- used in the treatment of alcoholism; can protect against alcohol poisoning
- has been used in the treatment of schizophrenia and senility

GLYCINE

- of special value as a source of creatine which is essential for muscle function, breaking down glycogen and freeing energy
- produces glycogen which mobilizes glycogen (a stored energy source of glucose) from the liver
- builds up the immune system, producing immunoglobulins and antibodies
- acts as a nitrogen pool for the synthesis of non-essential amino acids
- effective for hyperacidity (used in many gastric antacid agents)

L-HISTIDINE

- used in the treatment of allergic diseases
- used in the treatment of rheumatoid arthritis
- effective in the treatment of ulcers of the digestive organs
- important in the production of red and white blood cells; used in the treatment of anemia

L-ISOLEUCINE

- primarily metabolized in muscle tissue
- essential to the formation of hemoglobin
- should always be in well-balanced proportion with L-Leucine and L-Valine

AM

L-LEUCINE

- metabolized in muscle
- promotes healing
- lowers elevated blood sugar levels
- should always be in well-balanced proportion with L-Valine and L-Isoleucine

L-LYSINE

- induces the growth
- used in the treatment of rheumatoid arthritis
- produces L-Carnitine and fat metabolism
- promotes bone growth
- promotes protein synthesis
- acts in the absorption

L-METHIONINE

- is lipotropic, prevents fat accumulation
- helps prevent osteoarthritis
- interacts with other amino acids
- is included in liver fatigue agents

L-ORNITHINE

- stimulates the release of growth hormone
- helps build up the immune system
- promotes liver function
- important in the detoxification of ammonia which is poisonous to living cells
- promotes healing

L-PROLINE

- extremely important in the formation of collagen, the main supportive fibrous protein found in bone, cartilage and other connective tissue
- promotes healing

L-PHENYLALANINE

- produces and maintains alertness and attention
- promotes learning
- produces neurotransmitters
- is involved in dopamine synthesis
- used in the treatment of depression
- suppresses appetite

For educational purposes only. Not to be construed or used as labeling for any product.

EXHIBIT C

HEALTH FOODS BUSINESS/August 1985

HEALTH FOODS BUSINESS

Complaint

EXHIBIT C

AMINO ACID GUIDE

L-LEUCINE*

- metabolized in muscle tissue
- promotes healing of skin and broken bones
- lowers elevated blood sugar levels
- should always be in well balanced proportion with L-Valine and L-Isoleucine

L-LYSINE*

- inhibits the growth of viruses
- used in the treatment of herpes simplex virus
- produces L-Carnitine which improves stress tolerance and fat metabolism and has an anti-fatigue effect
- promotes bone growth by helping to form collagen, the fibrous protein which makes up bone, cartilage and other connective tissue
- aids in the absorption of calcium

L-METHIONINE*

- is isotropic, preventing excessive fat buildup in the liver
- helps prevent premature hair loss
- interacts with other body substances to detoxify harmful compounds
- is included in nutritional supplementation as an anti-fatigue agent

L-ORNITHINE

- stimulates the release of growth hormone which increases muscle mass while decreasing the amount of body fat
- helps build up the immune system
- promotes liver function and regeneration
- important in the formation of urea, detoxifying ammonia which is poisonous to living cells
- promotes healing

L-PROLINE

- extremely important for the proper function of joints and tendons, as well as good heart muscles
- glycogenic (energy storage source of glucose by the liver and muscles)
- a major constituent of collagen, the main fibrous protein found in bone, cartilage and other connective tissue

L-PHENYLALANINE*

- produces and maintains an elevated and positive mood, alertness and ambition
- enhances learning and memory
- produces neurotransmitters which control impulse transmission between nerve cells
- is involved in dopamine transmission
- used in the treatment of certain types of depression
- suppresses appetite

L-SERINE

- glycogenic (energy storage source of glucose by the liver and muscles)
- builds up the immune system, producing immunoglobulins and antibodies

TAURINE

- found in high concentrations in the tissues of the heart, skeletal muscles and central nervous system
- used to treat some forms of epilepsy by controlling seizures

L-THREONINE*

- is isotropic, preventing fatty buildup in the liver
- glycogenic (energy storage source of glucose by the liver and muscles)
- essential to normal growth
- generally low in vegetarian diets
- builds up the immune system, producing immunoglobulins and antibodies
- is an important constituent of collagen and elastin proteins

L-TRYPTOPHAN*

- Used by the brain to produce the neurotransmitter serotonin which results in a calming effect
- Used in the treatment of insomnia, stress, anxiety and depression
- stimulates the release of growth hormone which burns body fat and acts as a natural weight control
- Used in the treatment of migraines

L-TYROSINE

- plays an important role in the function of the adrenal, pituitary and thyroid glands
- generates red and white blood cells
- elevates mood
- is used in the treatment of anxiety, depression and insomnia
- produces Melanin, the skin and hair pigment
- produces norepinephrine, an appetite inhibitory neurotransmitter that suppresses appetite
- stimulates the release of growth hormone which causes muscle growth and reduces body fat

L-VALINE*

- glycogenic (energy storage source of glucose by the liver and the muscles)
- metabolized in muscle
- should always be in well balanced proportion with L-Leucine and L-Isoleucine
- used in the treatment of severe amino acid deficiencies caused by addictions

* Essential Amino Acid © Roger Prince 1984
Prince Enterprises, Santa Cruz, CA Used with permission

For educational purposes only. Not to be construed or used as labeling for any product

HEALTH FOODS BUSINESS/August 1988

IDE

and hair
arthritis and burns
ny disorders such

by in the immune
nose to disease

bolem
as an secretory

blood brain barrier
n the process picks
y method the brain

other amino acids

id in the treatment

d as a brain fuel
chem, can protect
if schizophrenia and

store which is essen-
y down glycogen and

as glycogen is stored
the liver

am, producing im-
he synthesis of non-

many gastric and acid

ic diseases
method arthritis
dians of the digestive
ad and white blood cells,
na

is tissue
hemoglobin
acid proportion with L-

product.

OODS BUSINESS/August 1988

EXHIBIT D

ATTENTION MEN!**PROSTEX
Can Help You!**

If you are over 50 years of age and Benign Prostatic Hypertrophy is causing these discomforts:

- Frequent urination • Painful urination
- Urgency to urinate • Dribbling
- Distended bladder due to incomplete emptying
- Sleepless nights caused by night time urination

Developed by a doctor — Prostex is a scientific combination of 3 pure amino acids in capsule form. It is safe, natural and effective when taken as directed (6 tablets daily) to relieve the symptoms of Benign Prostatic Hypertrophy.

If you suffer from urinary distress, see your doctor. Then, if he diagnoses Benign Prostatic Hypertrophy, use Prostex for safe, natural relief.

QTY.	PROD. NO.	PRICE*
------	-----------	--------

100	4030	9.95
-----	------	------

*Our Special Sale does not apply.

**Increase Stamina,
Vigor and Endurance
OCTACOSANOL**

The Secret of Wheat Germ Revealed**Sugar, Starch and Preservative Free**

Octacosanol has been isolated as one of the most important ingredients found in wheat germ oil. In fact, a recent study at the University of Illinois has shown that Octacosanol may speed reaction time, lower cholesterol levels and strengthen muscles (including the heart).

1000 mcg. Capsules

QTY.	PROD. NO.	3 FOR
50	3820	9.85
100	3822	18.15
250	3823	42.40

5000 mcg. Tablets

Five times the potency in one convenient tablet.

QTY.	PROD. NO.	3 FOR
50	4270	12.95
100	4271	22.75

**MAN-VITES™
VITAMIN FORMULA
SPECIFICALLY FOR MEN**

These chewable tablets have a pleasing honey-nut flavor and contain 100 I.U. of Vitamin E, 100 mg. of all natural Bee Pollen, rich in protein and free amino acids, and 100 mcg. of Vitamin B-12. This combination may be what your body needs to meet your unique requirements.

QUANTITY	PROD. NO.	3 FOR
----------	-----------	-------

100	541	8.55
-----	-----	------

Sugar, Starch and Preservative Free

**INTERNATIONAL
TREASURES
GINSENG**

Ginseng is one of the oldest and most highly regarded herbs known to man. It has been referred to as the "root of life, the queen of herbs" and the "herb of eternal life." Ancient Asians prized it more than gold and royal families gave it as gifts.

Modern research in the Soviet Union resulted in its use by Russia's olympic athletes and her cosmonauts. It is also part of the diet of Japan's professional baseball players.

If you're looking for results, Puritan's Pride Ginseng is the finest high quality product you can buy. It is cultivated in the Asian Area which yields the greatest potency, high quality roots.

Sugar,
Starch &
Preservative
Free

**MANCHURIAN GINSENG
250 mg. Capsules**

QTY.	PROD. NO.	3 FOR
------	-----------	-------

50	1270	6.25
100	1271	11.60



Higher
Potency

500 mg. Tablets

QTY.	PROD. NO.	3 FOR
------	-----------	-------

50	3110	9.40
100	3111	17.25
250	3113	40.10

**KOREAN GINSENG
500 mg. Capsules**

QTY.	PROD. NO.	3 FOR
------	-----------	-------

100	5021	16.90
-----	------	-------

Buy 1 Bottle GET 2 FREE (TOTAL 3) (same item, same size)

47

Complaint

EXHIBIT E

120 F.T.C.

206

Natural Pain Relief**M-KYA® (LEG-EZE)****Relieves Leg Cramp Pain.**

Enjoy a full night's sleep without painful leg cramps. A non-prescription formula, M-KYA actually relaxes the knotted, tight muscles that cause painful leg cramps. Conventional pain relievers simply dull pain. M-KYA works directly on the muscles, relaxing them to relieve pain.

QTY.	PROD. NO.	PRICE*
50	3961	11.95
100	3962	22.20

Compare to Q-Vel***

Each capsule contains:
250 mg. of d,l-mg. (quinine sulfate) active;
with 400 I.U. Vitamin E and a secretin
salt.
***Q-Vel is a registered trademark of
Puritan Products.

**Long Lasting
Arthritis Pain Relief****MYKON PLUS Tablets**

Do all those things you used to enjoy before the pain of arthritis, bursitis and rheumatism stopped you. You'll even be able to sleep the whole night through.

Take doctor-recommended MYKON PLUS Tablets for natural pain relief. MYKON PLUS is powerful yet so safe it is available without prescription. The special ingredients in MYKON PLUS work quickly to ease aches and pains giving fast, temporary relief.

QTY.	PROD. NO.	PRICE*
100	4090	9.85

For Complete Formula see Page 88.

*Our Special Sale
does not apply.**DL-PHENYLALANINE****An aid for offsetting
depression and relieving pain.**

Research suggests that this pure form of DL-Phenylalanine will perform a superior function as a nutritional supplement. It has been reported to aid in offsetting depression and in relief of pain.

Ours is the pure form of DL-Phenylalanine and not a mixture of both "D" and "L". Each tablet contains 500 mg.

QTY.	PROD. NO.	PRICE*
50	4050	10.95
100	4052	20.30

BACK-EZE

Back-Eze is a brand new supplement that combines the specific nutritional elements found in healthy spines and discs. Each tablet provides essential vitamins and minerals including calcium, magnesium, zinc, potassium, vitamin C and vitamin B-6 to help fight the aching-back syndrome. Try some Back-Eze today.

*Our special sale does not apply.

QTY.	PROD. NO.	PRICE*
120	8066	9.95



until 10 pm
Eastern Time - Mon.-Fri.
Sat.-6 pm

Buy 1 Bottle GET 2 FREE (TOTAL 3) (same item, same size)

**NEW ZEALAND
GREEN LIPPED
MUSSEL
EXTRACT**

It has been shown in recent studies that Green Lipped Mussel not only relieves the symptoms of arthritis, but works on the cause. For relief of one of the most painful and disconcerting ailments, try Puritan's Pride Green Lipped Mussel today!

250 mg.

Sugar & Starch Free

QUANTITY	PROD. NO.	PRICE*
100	4950	15.95

**Soothe
Pain
Away****COOL HOT GEL**

Compare to the active ingredient of "Mineral Ice".

Apply Puritan's Pride Cool Hot Gel to get soothing relief. This remarkable creamy balm gives overnight temporary relief from the pain of arthritis, bursitis, rheumatism, soreness, stiffness and annoying aches and pains of the common cold. Experience the only-cool of an ice-pack then toasty heat to bring deep soothing relief. Begin to sleep peacefully again. You will actually feel the lessening of pain within 24 hours.

QUANTITY	PROD. NO.	PRICE*
8 OZ.	2090	8.95

EN
ave a
con-
30 mg.
rich in
is, and
2. Thus
it your
unique

FOR
3.55

VAL

3

I highly
referred
and the
it more
ted in its
er cos-
Japan's
Ginseng
buy. It is
greatest

ENG

\$
FOR
6.25
1.50

lets

FOR
9.40
7.25
10.10

NG

85
FOR
18.90

47

Complaint

EXHIBIT F

Losing weight is easy the KLB6[®] way

The original natural fat fighting plan that helps put you in shape.

KLB6[®]*** Kelp, Lecithin, Vitamin B-6 and Cider Vinegar, all-in-one capsule.

KELP — a natural food rich in iodine. It works to maintain a healthy thyroid. And of course, a sluggish metabolism is an enemy to anyone wishing to shed a few pounds.

LECITHIN — an excellent natural source of choline and inositol—two members of the B-Complex of vitamins. Lecithin is essential to health and is of special interest if you're concerned about weight reduction. It is a lipotropic agent that disperses fat globules in the body and also appears to be involved in keeping down the cholesterol level.

B-6 — functions as a coenzyme involved in protein and fat metabolism when used in conjunction with kelp, lecithin and cider vinegar.

CIDER VINEGAR — a natural and rich source of potassium and other associated minerals.

8 KLB6 capsules daily contain:	mg.	QTY.	PROD. NO.	3 FOR
Vitamin B-6 (Pyridoxine HCl)	600	100	1210	5.95
Soya Lecithin	50	250	1213	13.25
Kelp	240			
Cider Vinegar				

Sugar and Starch Free

Lose weight naturally with . . .
FATBUSTER[™] DIET TEA..

- NO caffeine
- NO side-effects
- aids in digestion
- calms tense nerves

Share in the ancient Chinese secret for weight loss! This exclusive tea contains Chinese herbs such as ginseng, comfrey and other herbs, carefully blended according to a thousand-year old oriental formula. The result is a flavorful beverage that actually helps you shed unwanted pounds! When taken after every meal, the special combination of herbs filters through fatty substances, aiding your body in eliminating them, and as a bonus, the delicious taste and aroma have a calming effect on your nerves, making you feel refreshed and rejuvenated.

QTY.	PROD. NO.	PRICE*
30 Tea Bags	5686	8.95

*Our special sale does not apply.

HERBAL CELLULEX FORMULA

Compare to Herbalife's[®] Cell-U-Loss

Millions of dieters have used this unique herbal-vitamin formula as part of their herbal diet weight loss plan. Herbal Cellulex is a special herbal formula fortified with natural Vitamin C, Potassium and Iron. You also get the famous Kelp, Lecithin and Cider Vinegar "fat fighters" plus 6 herbal extracts.

Three Herbal Cellulex tablets contain:	mg.	QTY.	PROD. NO.	3 FOR
Herbal C (with Rose Hips)	250	90	4002	12.95
Potassium	25			
Iron	15			
Vitamin C (with Rose Hips)	100			
Biotin	10			
Calcium	10			
Copper	10			
Cider Vinegar	100			
Kelp	100			
Lecithin	100			

***The amount of weight you lose will depend on your body type, calorie intake and level of activity. **With starting any diet, you should first consult your physician.

Buy 1 Bottle GET 2 FREE (TOTAL 3) (same item, same size)

For those who prefer a higher potency tablet

ULTRA KLB6[®]***

Sugar, Starch and Preservative Free

This formulation offers what we believe to be the highest potency of this ideal combination in a tablet. ULTRA KLB6 tablets provide an ideal supplement to the now-famous 1000 calories per day diet that is being followed successfully by many thousands throughout the country.

Three Ultra KLB6 tablets contain:	mg.	QTY.	PROD. NO.	3 FOR
Lecithin	200	100	1240	5.95
Vitamin B-6 (Pyridoxine HCl)	50	250	1243	15.80
Kelp	240	500	1245	29.25
Cider Vinegar	100			
U.S. FDA has not been established.				
KLB6 [®] is a trademark registered trademark.				



until 10 pm
Eastern Time • Mon.-Fri.
Sat.-6 pm

120 F.T.C.

206

Complaint

EXHIBIT G



For Dieters and Cholesterol Watchers! Low Fat Cooking with Diet Brush

This amazing brush has high technology polymer fibers that attract grease like a magnet, but repel other liquids. Brush it across the top of soups, stews and roasts to skim off the floating fat. Stir with it, and it removes from deep down. Wipe bacon, french fries and hamburgers to reduce fat and calories. Works better and cheaper than paper towels. Brush washes* as clean in sink or dishwasher.

QTY.	PROD. NO.	PRICE*
1 Brush	5679	4.95

*Our special sale does not apply.

SHAKE-A-WEIGH Adds flavor to your diet while suppressing your appetite

NEW

This great tasting seasoning contains an appetite suppressant, a diuretic to reduce water retention; enzymes to break down food and Pantothenic Acid (B5) which helps food to pass rapidly through your digestive tract allowing less time to absorb calories.

Shake-A-Weigh is a natural assortment of herbs and spices you can sprinkle on salads, soups, meats, etc., to enhance the flavor of food. Use it like any flavoring or spice.

QTY.	PROD. NO.	PRICE*
1	5675	7.95

*Our Special Sale does not apply.

TRYMTONE 1200 All-Natural Amino Acid Dietary Supplement



A natural weight loss helper derived from vegetable sources specially formulated for those concerned with their nutritional well-being. This safe, drug-free amino acid dietary supplement gives you the power of three essential amino acids L-Arginine, L-Glycine & L-Lysine along with 15 mg. Pyridoxine HCl, which acts as a co-enzyme in carbohydrate, protein and fat utilization.

QTY.	PROD. NO.	1 BOTTLE FOR*
120	5687	15.95

*Our special sale does not apply.

44

Buy 1 Bottle GET 2 FREE (TOTAL 3) (same item, same size)

GLUCOMANNAN** 500 mg. Capsules

Feel Full, Satisfied
and Eat Less

When taken with 8 ounces of water, the Glucomannan Capsules instantly start to form a high fiber gel in your stomach. This gel provides you with the bulk you need to curb your appetite before you take in unnecessary calories. In addition, Glucomannan helps your body to process your food easier and faster. Therefore many of the calories you do take in pass through your digestive tract undigested without adding inches to your waistline. Helps you lose weight without harmful drugs, chemicals or stimulants.

QTY.	PROD. NO.	1 FOR
90	1891	14.90
250	1893	37.25

Get That Full Feeling Naturally... GUAR GUM Capsules**

It's Natural, Safe
and Works Fast!

Guar Gum is the natural gel-forming fiber that many medical experts are recommending as a new, effective diet aid. It is a natural soluble fiber that comes from the guar plant, found in India and Sri Lanka.

Guar Gum works because it helps to make your stomach feel full, reducing your appetite naturally. Even if you've tried other appetite suppressants before, you owe it to yourself to try Guar Gum, the one that really works.

QTY.	PROD. NO.	1 FOR
100	4670	5.95

Caps

**The amount of weight you lose will depend on your body size, calorie intake and level of activity. As with any diet, you should first consult your physician.

EXHIBIT H

**Reduce
Excess
Body Water****Natural
Herbal
Diuretics****Yeast, Sugar, Salt
& Preservative Free****WATER PILL™
TABLET
with POTASSIUM**

This totally protein coated Water Pill tablet (diuretic) is fortified with Potassium.

Each Water Pill with Potassium

Tablet Contains:	
Buckley's Laxative Powder	50 mg.
Uva Ursi Laxative Powder	50 mg.
Parsley Laxative Powder	50 mg.
Juniper Berry Powder	10 mg.
Potassium from Gluconate	50 mg.

QTY.	PROD. NO.	PRICE
50	2210	3.75
100	2212	6.85
250	2213	15.95

**WATER PILL™
TABLET
with IRON
& POTASSIUM****Yeast, Sugar, Salt
& Preservative Free**

Helps reduce excess body water, and replace lost iron and potassium.

Each Water Pill with Iron & Potassium

Tablet Contains:	
Buckley's Laxative Powder	50 mg.
Uva Ursi Laxative Powder	50 mg.
Parsley Laxative Powder	50 mg.
Juniper Berry Powder	10 mg.
Potassium from Gluconate	50 mg.
Iron from Ferrous Gluconate	5 mg.

*Three (3) tablets daily provide 100% of the Recommended Daily Allowance of iron for adults and children over 12.

QTY.	PROD. NO.	PRICE
50	2380	4.70
100	2382	8.70
250	2383	19.95

**Lose weight fast while you
spoil yourself with either a
luscious chocolate, creamy
vanilla, or delicious
strawberry taste.**

NATURE'S BOUNTY®**SLIM®
QUICK™**

Imagine the richest, thickest and most luscious shakes ever and you'll know just how satisfying Slim Quick really is. The best part about indulging yourself with this rich diet shake is that with every passing day on this meal replacement plan you'll be closer to your goal of a new slimmer you.

**Fortified
with FIBER,
CALCIUM
and 20
Vitamins &
Minerals****Chocolate**

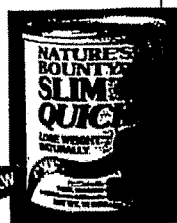
QTY.	PROD. NO.	PRICE
14 oz.	5581	10.95

Vanilla

QTY.	PROD. NO.	PRICE
14 oz.	5565	10.95

Strawberry

QTY.	PROD. NO.	PRICE
14 oz.	5567	10.95



**Stop Sugar Calories
before they make it
to your waistline.**

SUGAR BLOCKER™

New Sugar Blocker contains the herb Gymnema Sylvestre which helps to impede the absorption of some of the sugar you eat. Sugar Blocker works because its molecular structure mimics the molecular structure of sugar. When taken before a meal, Sugar Blocker occupies the same sites in the small intestine where sugar is absorbed. With these sites blocked, the sugar passes through your system greatly reducing assimilation by the body. Sugar Blocker itself also passes out of your body eventually, making this amazing new food supplement safe to use with no side effects.

QTY.	PROD. NO.	PRICE
90	5696	14.95



Buy 1 Bottle GET 1 FREE (Total 2) * Buy 2 Bottles GET 3 FREE (Total 5) 83

120 F.T.C.

206

Complaint

EXHIBIT I

Is it really possible to lose weight while you still eat most of your favorite foods?

Yes!

FIBER DIET lets you do it!

Fiber Diet is an all natural food supplement that helps you lose weight while improving your diet. It helps you look and feel great. Here's how it works... Fiber Diet is a special combination of grain and fruit fiber. Recent medical research confirms that a high fiber diet is healthier and an effective, natural way to lose weight. And keep it OFF! You simply take Fiber Diet tablets with water. 15-30 minutes before you eat. You can eat what you want, but it's always sensible to avoid highly processed food, sugar or fat. Fiber Diet absorbs water to give you a full feeling and cut your hunger so you naturally eat less, and so, you lose weight. Fiber Diet is completely free of drugs! It has no artificial colors. There is no caffeine or sodium (salt). So you can use Fiber Diet with confidence for as long as you need.

Sugar, Starch & Preservative Free



QTY.	PROD. NO.	3 FOR
120	4122	6.95
250	4123	13.20
500	4125	21.95

Diet without hunger... the natural way

SPIRULINA 500 mg. Tablets

People are reporting fast weight loss of 20 pounds and more... without hunger! The best thing about Spirulina is that it is totally natural. It is a unique type of vegetable plankton that grows in the pure lake waters of Central America and Africa. Spirulina contains up to 65% protein plus an incredible amount of vitamins and minerals.

Sugar, Starch and Preservative Free

Taken before meals it helps turn off your brain's hunger center. It cuts your drive to eat, so you stick to your diet.

QUANTITY	PROD. NO.	3 FOR
60	3281	6.80
500	3285	46.50

Makes a delicious drink to help you lose weight fast

PURITAN'S PRIDE SLIM™

Nutritionally Balanced Diet Meal Replacement with Fiber and NutraSweet!

Our most delicious formula ever! Mixed with skim milk Puritan's Pride Slim tastes like a rich chocolate candy bar. The flavor comes from real chocolate, natural carbohydrate sweetener and NUTRA-SWEET which adds sweetness with almost no calories. PLUS it's loaded with healthful fiber to fill

you up. Try Puritan's Pride Slim today and start losing weight. It's nutritious, inexpensive and delicious!

QTY.	PROD. NO.	3 FOR
16 oz. (1 lb.)	2260	16.65

Serving Size: 1 oz.
Servings per 16 oz. container: 16
Each Serving Provides: 8 Fl. Oz. Skim Milk***
Calories: 190
Protein: 17 gms.
Carbohydrate: 30 gms.
Fat: 1 gm.
Fiber (Dietary): 2500 mg.

PERCENTAGE OF U.S. RECOMMENDED DAILY ALLOWANCE (U.S. RDA)
Vitamin A: 40%
Vitamin C (Ascorbic Acid): 25%
Vitamin B-1 (Thiamine): 25%
Vitamin B-2 (Riboflavin): 25%
Niacinamide: 25%
Calcium: 25%

Vitamin D: 25%
Vitamin E: 25%
Vitamin B-6: 25%
Folic Acid: 25%
Vitamin B-12: 25%
Phosphorus: 25%
Iodine: 25%
Magnesium: 25%
Zinc: 25%
Copper: 25%
Biotin: 25%
Panthenic Acid: 25%
Manganese: 25%
Potassium: 25%
*No U.S. RDA established
**Vitamin A & D, Protein Fortified
Phenylalanine: 25%
Phenylalanine: 25%

Double Rich Chocolate Flavor

*NutraSweet is a registered trademark of G.D. Searle & Co.

Buy 1 Bottle GET 2 FREE (TOTAL 3) (same item, same size)

EXHIBIT J

A Perfect Combination for Healthy Blood

Natural EPA Softgel Capsules with Odorless Garlic

Sugar, Starch and Preservative Free

Medical evidence continues to indicate that fish oils can substantially reduce cholesterol and blood pressure. New EPA with Garlic from Puritan's Pride is a unique combination of fish oils combined with odorless garlic to maximize your nutritional benefits. Now you can have the combined benefit of both EPA (marine lipid concentrate) and natural garlic all in one easy to swallow softgel capsule.

Each EPA with Garlic Capsule contains:
 Marine Lipid Concentrate 1000 mg
 EPA (Eicosapentaenoic Acid) 180 mg
 DHA (Docosahexaenoic Acid) 120 mg
 Garlic Powder 50 mg
 Vitamin E (d-Alpha Tocopherol) 70 mg
 Ascorbyl Palmitate 20 mg
 Lemon Oil 15 mg

QTY.	PROD. NO.	PRICE	SALE
50	6330	5.50	5.25
100	6332	10.95	9.45
250	6335	27.40	21.95

Don't Let Cataracts Dim Your Vision

EYE-VITES® Tablet

A Nutritional Breakthrough in Cataracts Prevention

An alarming 2 out of 3 Americans over age 60 develop cataracts, a condition that clouds the lens of the eye and blurs the vision. For most cataracts sufferers, the usual surgical solution is an unpleasant alternative to the problem. But now, thanks to the efforts of a group of dedicated vision scientists, there's Eye-Vites... the nutritional approach to the prevention of age related cataracts. The potent anti-oxidants and micro-nutrients in Eye-Vites combine to help prevent the formation of cataracts. Research has proven that patients undergoing anti-oxidant therapy were 70% less likely to develop cataracts. Even if you already have cataracts you owe it to yourself and your sight to try Eye-Vites to help stabilize your problem. It's safe, natural and available to you without a prescription.

QTY.	PROD. NO.	PRICE*
60	5626	16.95

*Our special sale does not apply.

86 Buy 1 Bottle GET 1 FREE (Total 2) • Buy 2 Bottles GET 3 FREE (Total 5)

Natural EPA Marine Lipid Concentrate 1000 mg. Capsules

Sugar, Starch and Preservative Free

Now you can increase your intake of EPA and DHA, the two essential Omega-3 fatty acids without having to eat large amounts of oily fish. Just one capsule of Puritan's Pride EPA Marine Lipid Concentrate provides 180 mg. of EPA (Eicosapentaenoic acid) and 120 mg. of DHA (Docosahexaenoic acid) plus 1 I.U. of natural Vitamin E as an antioxidant. Puritan's Pride is proud to offer you such a beneficial natural supplement. Order your supply today!

QTY.	PROD. NO.	PRICE
50	3830	5.50
100	3832	9.95
250	3835	22.95

An Exciting Blend of Nutrients to Help Sharpen Your Mind

MEMORY BOOSTER™

Memory Booster from Puritan's Pride combines these special natural ingredients to work together as an aid to memory retention and mental alertness.

Two Memory Booster tablets provide:

- L-Glutamine 250 mg. — An important amino acid used by the brain as an energy source for high level brain activity.
- Ribonucleic Acid (RNA) 250 mg. — A key factor for cell reproduction vitally important to living cells and believed to be a memory and learning component that assists the brain.
- L-Phenylalanine 250 mg. — An amino acid capable of producing Epinephrine, a vital element of healthy neuroactivity.
- Choline Bitartrate 250 mg. — Part of the Vitamin B-Complex group and component of acetylcholine, important for nerve impulse transmission.
- Gotu Kola 250 mg. — A widely used herb taken to avoid mental fatigue and improve mental acuity.
- Lecithin 1000 mg. — A rich source of choline which has been shown to aid the memory and learning processes of the brain.

QTY.	PROD. NO.	PRICE	Sugar, Starch and Preservative Free
50	2070	8.95	
100	2072	16.95	
500	2073	73.95	

120 F.T.C.

206

Complaint

EXHIBIT K

KLB6 DIET MIX²

Many people who have tried other diet drinks find them difficult to tolerate and not nearly as satisfying. A few years ago we introduced KLB6 Diet Mix, a much better diet plan. Used by millions of successful dieters, KLB6 Diet Mix is the exclusive formula fortified with kelp, lecithin, and Vitamin B-6. Its vanilla flavor and luscious chocolate flavor makes it the most delicious, easy to take, effective weight loss plan that can work for you.

Taken as directed, twice a day, KLB6 Diet Mix provides 100% of the U.S. RDA of all the most important vitamins and minerals plus 80% of your protein requirement. There is no easier way to lose weight while maintaining sound nutrition.

Chocolate

(tastes like a rich chocolate shake)

QUANTITY	PROD. NO.	3 FOR
14 OZ.	2600	11.95

Vanilla Flavor

(tastes like a creamy vanilla shake)

QUANTITY	PROD. NO.	3 FOR
14 OZ.	2590	11.95

KLB6 GRAPEFRUIT DIET[®]
The Ultimate
Grapefruit Diet3 Powerful Diet Aids
in 1 Formula

- KLB6[®] • Grapefruit Extract
- Glucomannan

Puritan's Pride brings you the ultimate grapefruit diet formula to help you lose weight. You get the famous KLB6 combination that helps keep your body active so you can burn calories. Grapefruit extract works as a "fat-melter" to stimulate your metabolism and suppress the appetite. The Glucomannan in KLB6 Grapefruit Diet forms a natural high fiber gel in your stomach to give that feeling of fullness. Dieting is so much easier without those nagging hunger pains. Follow the diet plan provided and start losing weight quickly and safely.

FOUR (4) TABLETS PROVIDE:

Grapefruit Extract	200 mg.	Kelp	75 mg.
Glucomannan	500 mg.	Cider Vinegar	100 mg.
Vitamin B-6	20 mg.	Live Lysine	25 mg.
Lecithin	200 mg.	L-Phenylalanine	25 mg.

**100% of the U.S. Recommended Daily Allowance for adults and children 12 or more years of age for Vitamin B-6.

QUANTITY	PROD. NO.	3 FOR
100	3970	8.95
250	3973	20.90
500	3975	38.60

Buy 1 Bottle GET 2 FREE (TOTAL 3) (same item, same size)

CO ENZYME Q-10

10 mg. Tablets
and 75 mg. Capsules

Co Enzyme Q-10 has been the subject of important research for the past 30 years. This nutrient reportedly plays a role in the body's production of adenosine tri-phosphate, the basic energy component of the cell. Popular as a cardiovascular supplement in Japan, Co Enzyme Q-10 is now available to you from Puritan's Pride.

10 mg. Tablets

QTY.	PROD. NO.	3 FOR
50	4710	15.95

NEW POTENCY**75 mg. Capsules**

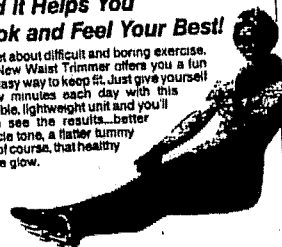
QTY.	PROD. NO.	3 FOR
30	5810	39.95

WAIST TRIMMER

It's Fun... It's Easy
and It Helps You

Look and Feel Your Best!

Forget about difficult and boring exercise. The New Waist Trimmer offers you a fun and easy way to keep fit. Just give yourself a few minutes each day with this portable, lightweight unit and you'll soon see the results...better muscle tone, a flatter tummy and of course, that healthy active glow.



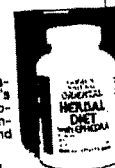
QUANTITY	PROD. NO.	SALE
1	5844	2.99*

*Our special sale does not apply.

ORIENTAL
HERBAL DIET

Thousands of people have discovered the Oriental Herbal Diet. It's a blend of Ephedra and Glucomannan from the Orient. Also contains vitamins B-6, lecithin, kelp and cider vinegar!

QTY.	PROD. NO.	3 FOR
84	4770	14.95



43

Complaint

120 F.T.C.

206

EXHIBIT L

FOOD SUPPLEMENTS

**GINSANA**

Concentrated Herbal Extract Helps Build Physical Endurance and Mental Alertness

Years of research studies have shown that endurance, mental alertness, cardiovascular performance and oxygen intake, were improved among Ginsana users. Developed in Switzerland, Ginsana is made of the finest standardized Ginseng extract G115. This all natural, non-habit forming non-allergenic herbal food supplement is available to you in easy-to-take softgel capsules. Order some today!

QTY.	PROD. NO.	PRICE*
30	8067	14.95

*Our special sale does not apply.

INTERNATIONAL TREASURES

GINSENG

Sugar, Starch & Preservative Free



Ginseng is one of the oldest and most highly regarded herbs known to man. It has been referred to as the "root of life, the queen of herbs" and the "herb of eternal life." Ancient Asians prized it more than gold and royal families gave it as gifts.

Modern research in the Soviet Union resulted in its use by Russia's Olympic athletes and her cosmonauts. It is also part of the diet of Japan's professional baseball players.

If you're looking for results, Puntan's Pride Ginseng is the finest high quality product you can buy. It is cultivated in the Asian Area which yields the greatest potency, high quality roots.

MANCHURIAN GINSENG™
250 mg. Capsules

QUANTITY	PROD. NO.	3 FOR
50	1270	6.25
100	1271	11.60

Higher Potency 500 mg. Tablets

QUANTITY	PROD. NO.	3 FOR
50	3110	9.40
100	3111	17.25
250	3113	40.10

KOREAN GINSENG
500 mg. Capsules

QUANTITY	PROD. NO.	3 FOR
100	5021	16.90

**Maintain Your Natural Energy, Vitality and Good Health!**

Recent articles in a leading magazine and numerous requests led our Research and Development team to offer this Nucleic Acid supplement which nutritionists are excited about!

RNA/DNA

Ribonucleic Acid & Deoxyribonucleic Acid

Each RNA/DNA tablet contains:
RNA (Ribonucleic Acid) 100 mg.
DNA (Deoxyribonucleic Acid) 100 mg.
In a base containing 400 mg. of Dried Deionized Brewer's Yeast.

QTY.	PROD. NO.	3 FOR
100	2150	7.65
250	2153	17.80
500	2155	33.20

Sugar & Starch Free

ORGANIC GERMANIUM

This fantastic nutrient has become one of the most talked about minerals. Recent studies show a wide variety of nutritional value and health benefits.

QTY.	PROD. NO.	3 FOR
60	5451	11.95

Buy 1 Bottle GET 2 FREE (TOTAL 3) (same item, same size)

120 F.T.C.

206

Complaint

EXHIBIT M

NEW

20. mental
lake, were
d, Ginsana
5. This all
plements is
ome today!

INSENG™
ules

3 FOR	
6.25	
11.60	

Tablets

3 FOR	
9.40	
17.25	
40.10	

ING

3 FOR	
16.90	

rgy,

quests led our
id supplement

NO.	3 FOR
10	7.65
13	17.80
15	33.20

NEW

NO.	3 FOR
1	11.95

W)

Eye Care Products

**A Nutritional
Supplement for
Healthy Eyes
and Vision**

**EYE-VITES®
Tablets**

Eye-Vites is a nutritional formula created to supplement your diet with the nutrients you need to help maintain healthy eyes and vision. Eye-Vites contain zinc, the mineral many researchers believe is essential for ocular nutrition, plus vitamins A, C, and E, the antioxidants involved in important metabolic processes in the eye. Taken daily, Eye-Vites are a safe, natural way to supplement your diet with the nutrients you need for healthy, clear vision.

QTY.	PROD. NO.	PRICE
60	5626	16.95

**EYE
PUFFINESS
MINIMIZER**

**Help Reduce
Undereye
Puffiness
and Swelling**

Help reduce the early morning puffiness and swelling that can occur under the eyes with this soothing, cool gel. Use it in the morning before applying makeup. It's a great way to begin your daily beauty regimen.

QTY.	PROD. NO.	PRICE*
.5 oz.	8239	5.95

*Our special sale does not apply.



**DARK CIRCLE
EYE
TREATMENT**

**Makes Your Dark
Circles Disappear**

Eliminate that fatigued look by making the unsightly dark circles under your eyes disappear. Dark Circle Eye Treatment is a new beauty discovery that therapeutically removes dark circles from the delicate area under your eyes in 2 easy steps. The Day Treatment actually makes circles go away while preventing eye makeup from creasing. The Night Treatment rejuvenates and moisturizes the dry area under your eyes where dark circles occur.

QTY.	PROD. NO.	PRICE*
2 Formula	8229	9.95

*Our special sale does not apply.

**Condition
dry, brittle
eyelashes!**

EYE-LASH OIL
Used nightly this unique blend of oils helps to build stronger healthier eyelashes. In just days you'll see the difference. Try some today!

QTY.	PROD. NO.	PRICE
1/3 oz.	8141	4.45

*Our special sale does not apply.



**Finally...
Fog Free
Vision
with**

OPTI-SHINE PEN

Have you ever walked in from outside only to have your glasses fog up on you? One application from the easy to use Opti-Shine Pen and your glasses are fog free. The applicator pen lasts for over 200 applications. Try it today. It really works.

QTY.	PROD. NO.	PRICE*
4	8091	5.00

**Keep your eyeglasses
from slipping off.**

OPTI-GRIP PEN

Just brush Opti-Grip on frame nosepieces and keep your eyeglasses or sunglasses exactly where you want them, all day long.

QTY.	PROD. NO.	PRICE*
4	8088	5.00

*Our special sale does not apply.

PERMA-TWEEZ

**Removes Unwanted
Hair...PERMANENTLY!!**

Now you can save hundreds of dollars in professional electrolysis treatments with the Perma-Tweez permanent hair remover! Perma-Tweez has been clinically tested for safety and effectiveness in removing hair from face, eyebrows, arms, legs or any part of your body...in the privacy of your own home! Easy to use. No skin-puncture safety feature. Order now and get rid of that unwanted hair...forever!!

QTY.	PROD. NO.	PRICE*
1	5690	19.95

*Our special sale does not apply.

68 Buy 1 GET 1 FREE (TOTAL 2) • Buy 2 GET 3 FREE (TOTAL 5)

EXHIBIT M

Complaint

120 F.T.C.

206

EXHIBIT N



NATURAL STEROL COMPLEX

MASS AND DENSITY ENHANCER

Each Six Tablets Contains:

GLANDULAR BALANCE AGENTS:

Mexican Wild Yam Root	1000 mg
Smilax Officinalis Extract	1000 mg
Mura Putana	1000 mg
Gota Kola	500 mg
Smilagenin	25 mg
Diosgenin	25 mg
Hecogenin	25 mg
Boron	3 mg

ANABOLIC STEROLS:

Gamma Oryzanol	500 mg
Fucosterol	7659 mcg
Beta-Sitosterol	5063 mcg
Campesterol	3376 mcg
Sitosterol	1924 mcg
Other Naturally Occurring Sterols	10,0991 mcg

AMINO ACIDS:

Arginine	1200 mg
Cystine	500 mg
Lysine	634 mg
Leucine	40 mg
Valine	38 mg
Isoleucine	30 mg
Phenylalanine	30 mg
Threonine	24 mg
Methionine	20 mg
Histidine	20 mg

LIPOTROPICS (FAT BURNERS):

Linoleic Acid	1040 mg
Oleic Acid	698 mg
Palmitic Acid	260 mg
Linolenic Acid	109 mg
Stearic Acid	56 mg
Lignoceric Acid	14 mg

Arachidonic Acid	13 mg
Eicosanoic Acid	11 mg
Behenic Acid	6 mg
Myristic Acid	5 mg

ENERGY STIMULANTS:

Bee Pollen	1000 mg
Guarana	500 mg
Korean Ginseng	100 mg
Cytophrome C	100 mg
Inosine	100 mg
Dimethylglycine	100 mg
Royal Jelly	30 mg

ELECTROLYTES:

Calcium	200 mg
Magnesium	100 mg
Potassium	99 mg

GROWTH AGENTS:

Oxacosanol	1650 mg
RNA	60 mg
DNA	30 mg

PERFORMANCE BOTANICALS:

Capalung	100 mg
Alafia	100 mg
Dandelion Root	100 mg
Garlic	100 mg
Yellow Dock	100 mg
Lionee Root	100 mg
Hops	100 mg

POTENTIATING FACTORS AND TRACE MINERALS:

Chromium, Silicon, Silver, Lithium, Strontium, Chlorine, Cobalt, Sulfur, Nickel, Titanium, Barium, Bismuth, Aluminum, Vanadium	
--	--

UNIVERSAL
NUTRITIONAL SYSTEMS

3 Terminal Rd., New Brunswick, NJ 08901 • 1-800-872-0101 (In NJ 1-908-545-3130)

EXHIBIT N

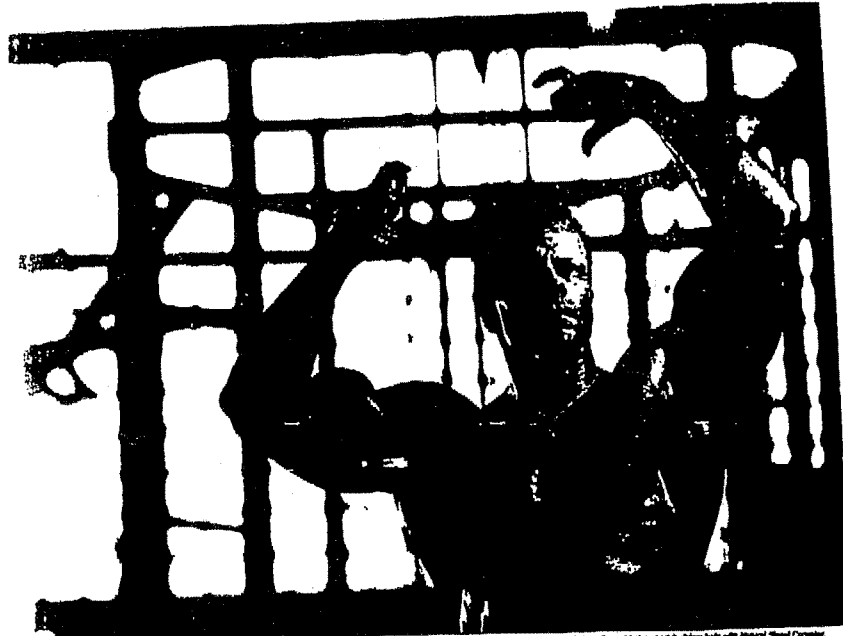
For serious
need real power
Natural Sterol C
advance, anab
or anyone looki
awe-inspiring bc
That's why
lifters swear by t
powerful, safest i
no other product
With an ex
Complex gives y
released tablet is
Glandular Balan

20 F.T.C.

206

Complaint

EXHIBIT N



To maximize gains in muscle mass and strength, world-class bodybuilders rely on Natural Steral Complex.

Experience the Power.

For serious growth in mass and strength, you need real power. And nothing powerizes you like Natural Steral Complex by Universal. It's the most advanced, anabolic-strength formula available today for anyone looking to build a huge, massive and awe-inspiring body.

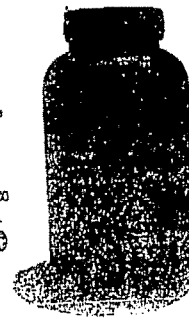
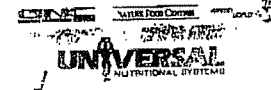
That's why serious bodybuilders and hardcore lifters swear by Natural Steral Complex as the most powerful, safest training supplement available. There's no other product nearly as potent or effective.

With an exclusive 2-way formula, Natural Steral Complex gives you more than ever before. Each time-released tablet is loaded with Anabolic Steroids, Glandular Balance Agents, and Essential Amino

Acids. Plus Electrolytes, Energizers, Lactocacids, Growth Agents and Performance Nutrients. You're energized for maximum anabolic gains and optimum performance.

Massive arms. Rock-hard Shoulders. Awesome legs. Chiseled abs. For building your body, nothing even comes close to the power of Natural Steral Complex. Experience it.

Natural Steral Complex is available in 90 and 100 tablet sizes at health food stores and gyms everywhere.



..... 13 mg
..... 11 mg
..... 8 mg
..... 5 mg

..... 1000 mg
..... 500 mg
..... 100 mg
..... 100 mg
..... 100 mg
..... 100 mg
..... 30 mg

..... 200 mg
..... 100 mg
..... 99 mg

..... 1550 mg
..... 50 mg
..... 30 mg

..... 100 mg
..... 100 mg
..... 100 mg
..... 100 mg
..... 100 mg
..... 100 mg

MINERALS:
m, Chlorine,
odium,

EXHIBIT O

Sports Nutrition

MUSCLE & WEIGHT GAINER

Chocolate & Vanilla Flavors

Muscle and Weight Gainer is a combination of free-form and branched chain amino acids to help build muscle mass and gain pounds. It is formulated with high quality milk and egg protein, 10 essential vitamins, 5 essential minerals, and 17 amino acids. Body Fortress Muscle & Weight Gainer gives you more body building protein, vitamins, minerals and amino acids than most other weight gain powders. For you that adds up to maximum nutritional power and weight gain potential, as much as 3 lbs. or more per week depending on how many shakes you drink. Natural energy packed carbohydrates are also included in Body Fortress Muscle and Weight Gainer to provide great taste and to help you recover quickly from your workouts.

Amino Acids Per 1/2 Gram Serving*	With 1 Cup Whole Milk
Alanine	940 mg. 1440 mg.
Arginine	470 mg. 1560 mg.
Aspartic Acid	1740 mg. 2640 mg.
Cysteine	325 mg. 370 mg.
Glutamic Acid	4675 mg. 9810 mg.
Glycine	580 mg. 980 mg.
Histidine	980 mg. 1115 mg.
Isoleucine	630 mg. 2275 mg.
Leucine	3235 mg. 5895 mg.
Lysine	1785 mg. 2640 mg.
Methionine	675 mg. 1080 mg.
Phenylalanine	1230 mg. 2305 mg.
Proline	2025 mg. 2780 mg.
Serine	1345 mg. 3235 mg.
Threonine	1010 mg. 1735 mg.
Tyrosine	1140 mg. 1965 mg.
Valine	1600 mg. 2425 mg.

*Essential Amino Acids

Chocolate Flavor

PROD. NO. 5463 QTY. 24 oz.

Vanilla Flavor

PROD. NO. 5461 QTY. 24 oz.

YOHIMBE BARK

760 mg. Tablets

History heralds the natural herb, yohimbe. Each tablet provides 760 mg. of yohimbe bark.

PROD. NO. 6351 QTY. 50 Tablets

SUPER FAT BURNERS

Super Fat Burners contains a special combination of vitamins, minerals and amino acids needed for the reduction of fat cells. The ingredients in this formula help the body's ability to burn fat, thereby promoting visible muscle definition.

Each Tablet Provides	U.S.A.
1,3-Bisphosphate	1000 mg.
Insulin	500 mg.
dl-Methionine	200 mg.
dl-Methionine	50 mg.
dl-Methionine	200 mg.

In a natural base of herb and help
* Recommended Daily Allowance for adults and children
12 or more years of age

PROD. NO. 6361 QTY. 40 Tablets

SMILAX

Smilax is a 100% pure cold processed Bio-Chelated Liquid Sarsaparilla Root Extract derived from the Smilax officinalis root. It is a highly concentrated liquid used by bodybuilders for added nutrition.

PROD. NO. 5740 QTY. 1 Fl. Oz.

CARBO-BOOSTER

Carbo-Booster Energy Drink is a combination of complex carbohydrates to help meet your energy needs during sustained sport activity or heavy training. This complex grouping of carbohydrates metabolizes at different rates and is digested slowly to provide maximum glycogen storage for prolonged energy demands.

Ingredients: Granulated complex carbohydrates extracted from grains. Fructose, Vitamin and Mineral Mix containing: Ascorbic Acid, Vitamin C, Citric Acid, Calcium L-Ascorbate, Magnesium L-Ascorbate, Sodium Ascorbate, Vitamin B-12, Vitamin B-6, Vitamin B-2, Vitamin B-1, Vitamin A, Vitamin E, Vitamin K, Vitamin P, Vitamin U, Vitamin W, Vitamin X, Vitamin Y, Vitamin Z, Vitamin AA, Vitamin AB, Vitamin AC, Vitamin AD, Vitamin AE, Vitamin AF, Vitamin AG, Vitamin AH, Vitamin AI, Vitamin AJ, Vitamin AK, Vitamin AL, Vitamin AM, Vitamin AN, Vitamin AO, Vitamin AP, Vitamin AQ, Vitamin AR, Vitamin AS, Vitamin AT, Vitamin AU, Vitamin AV, Vitamin AW, Vitamin AX, Vitamin AY, Vitamin AZ, Vitamin BA, Vitamin BB, Vitamin BC, Vitamin BD, Vitamin BE, Vitamin BF, Vitamin BG, Vitamin BH, Vitamin BI, Vitamin BJ, Vitamin BK, Vitamin BL, Vitamin BM, Vitamin BN, Vitamin BO, Vitamin BP, Vitamin BQ, Vitamin BR, Vitamin BS, Vitamin BT, Vitamin BU, Vitamin BV, Vitamin BW, Vitamin BX, Vitamin BY, Vitamin BZ, Vitamin CA, Vitamin CB, Vitamin CC, Vitamin CD, Vitamin CE, Vitamin CF, Vitamin CG, Vitamin CH, Vitamin CI, Vitamin CJ, Vitamin CK, Vitamin CL, Vitamin CM, Vitamin CN, Vitamin CO, Vitamin CP, Vitamin CQ, Vitamin CR, Vitamin CS, Vitamin CT, Vitamin CU, Vitamin CV, Vitamin CW, Vitamin CX, Vitamin CY, Vitamin CZ, Vitamin DA, Vitamin DB, Vitamin DC, Vitamin DD, Vitamin DE, Vitamin DF, Vitamin DG, Vitamin DH, Vitamin DI, Vitamin DJ, Vitamin DK, Vitamin DL, Vitamin DM, Vitamin DN, Vitamin DO, Vitamin DP, Vitamin DQ, Vitamin DR, Vitamin DS, Vitamin DT, Vitamin DU, Vitamin DV, Vitamin DW, Vitamin DX, Vitamin DY, Vitamin DZ, Vitamin EA, Vitamin EB, Vitamin EC, Vitamin ED, Vitamin EE, Vitamin EF, Vitamin EG, Vitamin EH, Vitamin EI, Vitamin EJ, Vitamin EK, Vitamin EL, Vitamin EM, Vitamin EN, Vitamin EO, Vitamin EP, Vitamin EQ, Vitamin ER, Vitamin ES, Vitamin ET, Vitamin EU, Vitamin EV, Vitamin EW, Vitamin EX, Vitamin EY, Vitamin EZ, Vitamin FA, Vitamin FB, Vitamin FC, Vitamin FD, Vitamin FE, Vitamin FF, Vitamin FG, Vitamin FH, Vitamin FI, Vitamin FJ, Vitamin FK, Vitamin FL, Vitamin FM, Vitamin FN, Vitamin FO, Vitamin FP, Vitamin FQ, Vitamin FR, Vitamin FS, Vitamin FT, Vitamin FU, Vitamin FV, Vitamin FW, Vitamin FX, Vitamin FY, Vitamin FZ, Vitamin GA, Vitamin GB, Vitamin GC, Vitamin GD, Vitamin GE, Vitamin GF, Vitamin GG, Vitamin GH, Vitamin GI, Vitamin GJ, Vitamin GK, Vitamin GL, Vitamin GM, Vitamin GN, Vitamin GO, Vitamin GP, Vitamin GQ, Vitamin GR, Vitamin GS, Vitamin GT, Vitamin GU, Vitamin GV, Vitamin GW, Vitamin GX, Vitamin GY, Vitamin GZ, Vitamin HA, Vitamin HB, Vitamin HC, Vitamin HD, Vitamin HE, Vitamin HF, Vitamin HG, Vitamin HH, Vitamin HI, Vitamin HJ, Vitamin HK, Vitamin HL, Vitamin HM, Vitamin HN, Vitamin HO, Vitamin HP, Vitamin HQ, Vitamin HR, Vitamin HS, Vitamin HT, Vitamin HU, Vitamin HV, Vitamin HW, Vitamin HX, Vitamin HY, Vitamin HZ, Vitamin IA, Vitamin IB, Vitamin IC, Vitamin ID, Vitamin IE, Vitamin IF, Vitamin IG, Vitamin IH, Vitamin II, Vitamin IJ, Vitamin IK, Vitamin IL, Vitamin IM, Vitamin IN, Vitamin IO, Vitamin IP, Vitamin IQ, Vitamin IR, Vitamin IS, Vitamin IT, Vitamin IU, Vitamin IV, Vitamin IW, Vitamin IX, Vitamin IY, Vitamin IZ, Vitamin JA, Vitamin JB, Vitamin JC, Vitamin JD, Vitamin JE, Vitamin JF, Vitamin JG, Vitamin JH, Vitamin JI, Vitamin JJ, Vitamin JK, Vitamin JL, Vitamin JM, Vitamin JN, Vitamin JO, Vitamin JP, Vitamin JQ, Vitamin JR, Vitamin JS, Vitamin JT, Vitamin JU, Vitamin JV, Vitamin JW, Vitamin JX, Vitamin JY, Vitamin JZ, Vitamin KA, Vitamin KB, Vitamin KC, Vitamin KD, Vitamin KE, Vitamin KF, Vitamin KG, Vitamin KH, Vitamin KI, Vitamin KJ, Vitamin KL, Vitamin KM, Vitamin KN, Vitamin KO, Vitamin KP, Vitamin KQ, Vitamin KR, Vitamin KS, Vitamin KT, Vitamin KU, Vitamin KV, Vitamin KW, Vitamin KX, Vitamin KY, Vitamin KZ, Vitamin LA, Vitamin LB, Vitamin LC, Vitamin LD, Vitamin LE, Vitamin LF, Vitamin LG, Vitamin LH, Vitamin LI, Vitamin LJ, Vitamin LK, Vitamin LL, Vitamin LM, Vitamin LN, Vitamin LO, Vitamin LP, Vitamin LQ, Vitamin LR, Vitamin LS, Vitamin LT, Vitamin LU, Vitamin LV, Vitamin LW, Vitamin LX, Vitamin LY, Vitamin LZ, Vitamin MA, Vitamin MB, Vitamin MC, Vitamin MD, Vitamin ME, Vitamin MF, Vitamin MG, Vitamin MH, Vitamin MI, Vitamin MJ, Vitamin MK, Vitamin ML, Vitamin MM, Vitamin MN, Vitamin MO, Vitamin MP, Vitamin MQ, Vitamin MR, Vitamin MS, Vitamin MT, Vitamin MU, Vitamin MV, Vitamin MW, Vitamin MX, Vitamin MY, Vitamin MZ, Vitamin NA, Vitamin NB, Vitamin NC, Vitamin ND, Vitamin NE, Vitamin NF, Vitamin NG, Vitamin NH, Vitamin NI, Vitamin NJ, Vitamin NK, Vitamin NL, Vitamin NM, Vitamin NN, Vitamin NO, Vitamin NP, Vitamin NQ, Vitamin NR, Vitamin NS, Vitamin NT, Vitamin NU, Vitamin NV, Vitamin NW, Vitamin NX, Vitamin NY, Vitamin NZ, Vitamin OA, Vitamin OB, Vitamin OC, Vitamin OD, Vitamin OE, Vitamin OF, Vitamin OG, Vitamin OH, Vitamin OI, Vitamin OJ, Vitamin OK, Vitamin OL, Vitamin OM, Vitamin ON, Vitamin OO, Vitamin OP, Vitamin OQ, Vitamin OR, Vitamin OS, Vitamin OT, Vitamin OU, Vitamin OV, Vitamin OW, Vitamin OX, Vitamin OY, Vitamin OZ, Vitamin PA, Vitamin PB, Vitamin PC, Vitamin PD, Vitamin PE, Vitamin PF, Vitamin PG, Vitamin PH, Vitamin PI, Vitamin PJ, Vitamin PK, Vitamin PL, Vitamin PM, Vitamin PN, Vitamin PO, Vitamin PP, Vitamin PQ, Vitamin PR, Vitamin PS, Vitamin PT, Vitamin PU, Vitamin PV, Vitamin PW, Vitamin PX, Vitamin PY, Vitamin PZ, Vitamin QA, Vitamin QB, Vitamin QC, Vitamin QD, Vitamin QE, Vitamin QF, Vitamin QG, Vitamin QH, Vitamin QI, Vitamin QJ, Vitamin QK, Vitamin QL, Vitamin QM, Vitamin QN, Vitamin QO, Vitamin QP, Vitamin QQ, Vitamin QR, Vitamin QS, Vitamin QT, Vitamin QU, Vitamin QV, Vitamin QW, Vitamin QX, Vitamin QY, Vitamin QZ, Vitamin RA, Vitamin RB, Vitamin RC, Vitamin RD, Vitamin RE, Vitamin RF, Vitamin RG, Vitamin RH, Vitamin RI, Vitamin RJ, Vitamin RK, Vitamin RL, Vitamin RM, Vitamin RN, Vitamin RO, Vitamin RP, Vitamin RQ, Vitamin RR, Vitamin RS, Vitamin RT, Vitamin RU, Vitamin RV, Vitamin RW, Vitamin RX, Vitamin RY, Vitamin RZ, Vitamin SA, Vitamin SB, Vitamin SC, Vitamin SD, Vitamin SE, Vitamin SF, Vitamin SG, Vitamin SH, Vitamin SI, Vitamin SJ, Vitamin SK, Vitamin SL, Vitamin SM, Vitamin SN, Vitamin SO, Vitamin SP, Vitamin SQ, Vitamin SR, Vitamin SS, Vitamin ST, Vitamin SU, Vitamin SV, Vitamin SW, Vitamin SX, Vitamin SY, Vitamin SZ, Vitamin TA, Vitamin TB, Vitamin TC, Vitamin TD, Vitamin TE, Vitamin TF, Vitamin TG, Vitamin TH, Vitamin TI, Vitamin TJ, Vitamin TK, Vitamin TL, Vitamin TM, Vitamin TN, Vitamin TO, Vitamin TP, Vitamin TQ, Vitamin TR, Vitamin TS, Vitamin TT, Vitamin TU, Vitamin TV, Vitamin TW, Vitamin TX, Vitamin TY, Vitamin TZ, Vitamin UA, Vitamin UB, Vitamin UC, Vitamin UD, Vitamin UE, Vitamin UF, Vitamin UG, Vitamin UH, Vitamin UI, Vitamin UJ, Vitamin UK, Vitamin UL, Vitamin UM, Vitamin UN, Vitamin UO, Vitamin UP, Vitamin UQ, Vitamin UR, Vitamin US, Vitamin UT, Vitamin UY, Vitamin UZ, Vitamin VA, Vitamin VB, Vitamin VC, Vitamin VD, Vitamin VE, Vitamin VF, Vitamin VG, Vitamin VH, Vitamin VI, Vitamin VJ, Vitamin VK, Vitamin VL, Vitamin VM, Vitamin VN, Vitamin VO, Vitamin VP, Vitamin VQ, Vitamin VR, Vitamin VS, Vitamin VT, Vitamin VY, Vitamin VZ, Vitamin WA, Vitamin WB, Vitamin WC, Vitamin WD, Vitamin WE, Vitamin WF, Vitamin WG, Vitamin WH, Vitamin WI, Vitamin WJ, Vitamin WK, Vitamin WL, Vitamin WM, Vitamin WN, Vitamin WO, Vitamin WP, Vitamin WQ, Vitamin WR, Vitamin WS, Vitamin WT, Vitamin WY, Vitamin WZ, Vitamin XA, Vitamin XB, Vitamin XC, Vitamin XD, Vitamin XE, Vitamin XF, Vitamin XG, Vitamin XH, Vitamin XI, Vitamin XJ, Vitamin XK, Vitamin XL, Vitamin XM, Vitamin XN, Vitamin XO, Vitamin XP, Vitamin XQ, Vitamin XR, Vitamin XS, Vitamin XT, Vitamin XU, Vitamin XV, Vitamin XW, Vitamin XX, Vitamin XY, Vitamin XZ, Vitamin YA, Vitamin YB, Vitamin YC, Vitamin YD, Vitamin YE, Vitamin YF, Vitamin YG, Vitamin YH, Vitamin YI, Vitamin YJ, Vitamin YK, Vitamin YL, Vitamin YM, Vitamin YN, Vitamin YO, Vitamin YP, Vitamin YQ, Vitamin YR, Vitamin YS, Vitamin YT, Vitamin YU, Vitamin YV, Vitamin YW, Vitamin YX, Vitamin YY, Vitamin YZ, Vitamin ZA, Vitamin ZB, Vitamin ZC, Vitamin ZD, Vitamin ZE, Vitamin ZF, Vitamin ZG, Vitamin ZH, Vitamin ZI, Vitamin ZJ, Vitamin ZK, Vitamin ZL, Vitamin ZM, Vitamin ZN, Vitamin ZO, Vitamin ZP, Vitamin ZQ, Vitamin ZR, Vitamin ZS, Vitamin ZT, Vitamin ZU, Vitamin ZV, Vitamin ZW, Vitamin ZX, Vitamin ZY, Vitamin ZZ.

Each Serving Contains:
Vitamin A 1000 IU
Vitamin B-1 10 mg.
Vitamin B-2 10 mg.
Vitamin B-6 10 mg.
Vitamin B-12 10 mg.
Vitamin C 100 mg.
Vitamin E 10 mg.
Vitamin K 10 mg.
Vitamin P 10 mg.
Vitamin U 10 mg.
Vitamin W 10 mg.
Vitamin X 10 mg.
Vitamin Y 10 mg.
Vitamin Z 10 mg.

PROD. NO. 5490 QTY. 16 oz.



Vitamin World uses only the finest ingredients from around the world

120 F.T.C.

206

Complaint

EXHIBIT P

NATURAL AMINO 1500 FREE FORM & PEPTIDE BOND

Body Fortress Amino Acids are specially formulated and scientifically balanced for bodybuilders, power lifters and professional athletes. This formula contains a balanced blend of free form and peptide bond Amino Acids to give you optimum utilization.

Ingredients: Pharmaceutical grade Amino Acids derived from lactobacillus hydrolyzate and L-Cysteine HCL.

Typical Amino Acid Profile Per Tablet	
L-Ornithine HCL	141.1
L-Lysine	83.2
L-Isoleucine	196.8
L-Arginine	379.2
L-Aspartic Acid	341.3
L-Threonine	374.3
L-Serine	829.2
L-Cysteine HCL	129.7
L-Proline	625.6
L-Glutamine	162.8
L-Alanine	386.8
L-Cysteine	250.9
L-Valine	445.3
L-Methionine	203.8
L-Isoleucine	543.5
L-Leucine	977.4
L-Tyrosine	249.7
L-Phenylalanine	374.3

*Essential Amino Acids

PROD. NO.	QTY.
5091	150 Tablets
5097	400 Tablets

ARGININE- ORNITHINE 1500

FREE FORM AMINO ACIDS

Body Fortress Arginine/Ornithine 1500 combines two of the body's most important building blocks into one potent supplement. Each ingredient comes to you in its natural "L" free-form state for maximum metabolic absorption and assimilation.

Each two tablets provide:	
L-Arginine (pharmaceutical grade)	1000 mg.
L-Ornithine (pharmaceutical grade)	500 mg.

PROD. NO.	QTY.
5411	60 Tablets



SUPER CUT

Super Cut is a special formulation of vitamins, minerals and amino acids needed for lean muscle development. The ingredients in this formula help the body's ability to burn fat, thereby promoting visible muscle definition.

Each two tablets contain:	
Choline	3000 mg.
Inositol	1000 mg.
DL-Methionine	400 mg.
DL-Methionine	100 mg.
Beta-HCL	400 mg.

In a natural base of liver and kelp

PROD. NO.	QTY.
5730	90 Tablets

Yeast Free CHROMAX II CHROMIUM PICOLINATE 200 mcg.

Chromium Picolinate is an organic chromium supplement. It is yeast free and highly assimilable, providing optimum effectiveness as a dietary supplement for the essential trace nutrient - chromium.

Each tablet contains:	
Chromium (Picolinate)	200 mcg.

PROD. NO.	QTY.
6390	100 Tablets

ANABOLIC BOOSTER

Branch Chain &
Free Form Amino Acids

PROD. NO.	QTY.
5402	30 Tablets

DIBENCOZIDE 10 mg.

PROD. NO.	QTY.
5860	60 Tablets

GAMMA ORYZANOL 60 mg.

PROD. NO.	QTY.
5420	100 Tablets

Crystalline Pure INOSINE 500 mg.

PROD. NO.	QTY.
4570	30 Tablets



LIQUID AMINO

PROD. NO.	QTY.
837	16 Fl. Oz.

EXHIBIT Q

DIGESTIVE AIDS
**Natural
CHEWABLE ANTACID
with Calcium**

**Supplies 200 mg. of
Elemental Calcium**

Salt, Starch and Preservative Free

A delicious fructose sweetened chewable tablet to help make life more comfortable for thousands of fuzzy stomachs. Each tablet contains 500 mg. of the active ingredient Calcium Carbonate to provide symptomatic relief and neutralize gastric acidity. Obtain relief from acid indigestion, heartburn and sour stomach with Puritan's Pride Natural Antacid.

QUANTITY	PROD. NO.	3 FOR
100	2220	4.95
250	2223	11.55
500	2225	21.45

**BETAINE
HYDROCHLORIDE
400 mg. Tablets**

Sugar and Starch Free

As we get older, some of us may have trouble digesting the foods we eat. Puritan's Pride Betaine Hydrochloride provides acids that can naturally assist in the digestion of fats, proteins and starches. One tablet taken before meals supplies the powerful digestive aid of 400 mg. of Betaine Hydrochloride.

QUANTITY	PROD. NO.	3 FOR
100	3850	4.30
250	3853	9.90

**HERBAL
LAXATIVE
Tablets**

**Safely
Encourages
Natural
Elimination**

Sugar and Starch Free
Now a natural way to obtain relief from the uncomfortable feeling of constipation. Puritan's Pride combines a mixture of natural active laxative ingredients, which include Senna Leaves, Cascara Sagrada and Frangula. This is a gentle all-vegetable and herb tablet.



QUANTITY	PROD. NO.	3 FOR
100	2180	4.45
500	2185	19.80

**Chewable
PAPAYA ENZYME
Tablets**

**An aid to better digestion from
papaya, "the Melon of the Tropics"**

Preservative Free

**New Fruit Flavored
Chewable Tablets**

Puritan's Pride manufactures this natural digestive aid in pleasantly small tablets. Each Papaya tablet contains the enzyme Papain which helps you digest protein and helps release the nutritional potency of your foods and also promotes comfortable natural digestive processes.

QUANTITY	PROD. NO.	3 FOR
100	1130	3.45
250	1133	7.95
500	1135	14.95



until 10 pm
Eastern Time - Mon.-Fri.
Sat.-3 pm

120 F.T.C.

206

Complaint

EXHIBIT R



CALMTABS™

All Natural
Non-Habit Forming
Herbal Relaxant

Puritan's Pride Calmtabs offers you a gentle and safe way to relax especially when everyday stress winds you up. This special formulation gives you 6 different herbs known for their calmative properties since the days of ancient Egypt. You can enjoy Calmtabs' soothing, calm effect anytime during the day or before bedtime.

**NEW EASY-TO-SWALLOW
PROTEIN-COATED TABLET**

Each Calmtabs tablet contains:
Ert. Valerian 1 grain
Passiflora 1 grain
Calm Seed 1 grain
Calm 1 grain
Hops 1 grain
Dried Orange Peel 1 grain

Sugar & Preservative Free

QTY.	PROD. NO.	3 FOR
90	3261	4.95
250	3263	12.65
500	3265	23.50

**Time Release
NIACIN 250 mg.**

Don't miss out on the benefits of Niacin. Puritan's Pride now offers you a Time Release 250 mg. size capsule. This new size has been micro-coated for easy swallowing, and has been specially processed to release its activity over 8 hours. Try some today!

QTY.	PROD. NO.	3 FOR
90	5800	7.99

**Natural
EVENING
PRIMROSE
OIL**

500 mg. Capsules
with
Natural Vitamin E
13 I.U.

Evening Primrose Oil is especially high in the essential polyunsaturated fatty acids - cislinoleic and gamma linolenic acid (GLA). Both are involved in the body's synthesis of prostaglandin, the chemical regulator of many body functions. Although both are involved, it is GLA which is directly converted to prostaglandin.

Evening Primrose Oil is not refined or hydrogenated. It is virtually the only natural source, other than mother's milk, which supplies GLA directly to the diet.

Sugar, Starch and Preservative Free

QTY.	PROD. NO.	3 FOR
30	3630	10.95
100	3632	32.95
250	3633	75.98

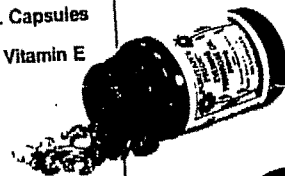
**POTASSIUM
99 mg.**

From potassium gluconate. Potassium helps in sending messages through the nervous system, keeps the body fluids properly balanced and helps attract nutrients from the blood stream into the cells. Without it sugar cannot be converted into energy nor can body starch be stored for future energy demands. This nutrient is excreted daily and therefore must be replaced each day.

Sugar and Preservative Free

**YOU NEED IT
EVERY DAY!**

QTY.	PROD. NO.	3 FOR
100	1111	2.95
250	1113	6.05
500	1115	11.10
1000	1118	20.40



**BLACK CURRANT
OIL**

460 mg. Capsules
from Black Currants

Black Currants have been found to be a rich, natural source of GLA. GLA is essential to good health because it is involved in the body's synthesis of Prostaglandin, the chemical regulator of many body functions.

Now Puritan's Pride is proud to offer you this new rich source of GLA.

QTY.	PROD. NO.	3 FOR
50	5600	16.50

Buy 1 Bottle GET 2 FREE (TOTAL 3) (same item, same size)

DECISION AND ORDER

The Federal Trade Commission having initiated an investigation of certain acts and practices of the respondents named in the caption hereof, and the respondents having been furnished thereafter with a copy of a draft of complaint which the Bureau of Consumer Protection proposed to present to the Commission for its consideration and which, if issued by the Commission, would charge respondents with violation of the Federal Trade Commission Act; and

The respondents, their attorney, and counsel for the Commission having thereafter executed an agreement containing a consent order, an admission by the respondents of all the jurisdictional facts set forth in the aforesaid draft of complaint, a statement that the signing of said agreement is for settlement purposes only and does not constitute an admission by respondents that the law has been violated as alleged in such complaint, or that the facts as alleged in such complaint, other than jurisdictional facts, are true and waivers and other provisions as required by the Commission's Rules; and

The Commission having thereafter considered the matter and having determined that it had reason to believe that the respondents have violated the said Act, and that a complaint should issue stating its charges in that respect, and having thereupon accepted the executed consent agreement and placed such agreement on the public record for a period of sixty (60) days, now in further conformity with the procedure prescribed in Section 2.34 of its Rules, the Commission hereby issues its complaint, makes the following jurisdictional findings and enters the following order:

1. Respondent Nature's Bounty, Inc., is a corporation organized, existing and doing business under and by virtue of the laws of the State of Delaware, with its office and principal place of business located at 90 Orville Dr., in the City of Bohemia, State of New York.

2. Respondent Puritan's Pride, Inc., is a corporation organized, existing and doing business under and by virtue of the laws of the State of Delaware, with its office and principal place of business located at 90 Orville Dr., in the City of Bohemia, State of New York. Puritan's Pride, Inc., is a wholly-owned subsidiary of Nature's Bounty, Inc.

3. Vitamin World, Inc., is a corporation organized, existing and doing business under and by virtue of the laws of the State of

Delaw
Orville
World

4.
matter
is in t

F

1
distr
unde
or u
any
any
with

ana
of j
eva
pro
acc

Pr
th
th
de
la
p
F
n
e

investigation in the caption reafter with a of Consumer sion for its would charge sion Act; and Commission onsent order, nal facts set t the signing nd does not een violated ged in such waivers and ; and

matter and respondents issue stating ccepted the n the public ormity with Commission risdictional

organized, laws of the of business New York. organized, laws of the of business New York. f Nature's

isting and e State of

Delaware, with its office and principal place of business located at 90 Orville Dr., in the City of Bohemia, State of New York. Vitamin World, Inc., is a wholly-owned subsidiary of Nature's Bounty, Inc.

4. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the respondents, and the proceeding is in the public interest.

ORDER

DEFINITIONS

For purposes of this order, the following definitions shall apply:

1. "*Product*" means any good that is offered for sale, sold or distributed to the public by respondents, their successors and assigns, under any brand name of respondents, their successors and assigns, or under the brand name of any third party. "Product" also means any product sold or distributed to the public by third parties under any brand name of respondents, or under private labeling agreements with respondents, their successors and assigns.

2. "*Competent and reliable scientific evidence*" shall mean tests, analyses, research, studies, or other evidence based on the expertise of professionals in the relevant area that has been conducted and evaluated in an objective manner by persons qualified to do so, using procedures generally accepted by others in the profession to yield accurate and reliable results.

I.

It is ordered, That respondents Nature's Bounty, Inc., Puritan's Pride, Inc., and Vitamin World, Inc., their successors and assigns, and their officers, agents, representatives, and employees, directly or through any partnership, corporation, subsidiary, division or other device, in connection with the manufacture, advertising, packaging, labeling, promotion, offering for sale, sale or distribution of any product in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from misrepresenting, in any manner, directly or by implication, the existence, contents, validity, results, conclusions, or interpretations

of any test, study, research article, or any other scientific opinion or data.

II.

It is further ordered, That respondents, their successors and assigns, and their officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division or other device, in connection with the manufacturing, advertising, labeling, packaging, offering for sale, sale, or distribution of "Sleeper's Diet," "L-Arginine," or "L-Ornithine," or any other substantially similar amino acid product, in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from representing, directly or by implication, that:

- A. Any such product stimulates greater production or release of human growth hormone in a user than a non-user of such product;
- B. Any such product promotes muscular development; or
- C. Any such product burns fat or otherwise alters human metabolism to use up or burn stored fat, or promotes weight loss.

For purposes of this order paragraph, "substantially similar amino acid product" shall mean any product which is of substantially similar composition or possesses substantially similar properties to Sleeper's Diet, L-Arginine or L-Ornithine.

III.

It is further ordered, That respondents, their successors and assigns, and their officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division or other device, in connection with the manufacturing, advertising, labeling, packaging, offering for sale, sale, or distribution of L-Cysteine, L-Methionine, or any other substantially similar hair care product, in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from representing, directly or by implication, that any such product will prevent or retard hair loss or promote hair growth where hair has already been lost. For purposes of this order paragraph, "substantially similar hair care product" shall mean any product that is advertised or intended for

sale over-
hair grow
substantia
properties

It is
assigns, &
directly c
device, in
packaging
product c
defined in
desist fro

A. Re

(1) TI
reverse, c
(2) TI
hair when

unless, a
possess a
substantia
B. M
offering
represent
the produ
such purp
U.S.C. 30
requirem

It is
assigns, &
directly c
device, in

120 F.T.C.

206

Decision and Order

sale over-the-counter to treat, cure or curtail hair loss or to promote hair growth where hair has already been lost, and which is of substantially similar composition or possesses substantially similar properties to L-Cysteine or L-Methionine.

IV.

It is further ordered, That respondents, their successors and assigns, and their officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division or other device, in connection with the manufacturing, advertising, labeling, packaging, offering for sale, sale, or distribution of any hair care product or service, in or affecting commerce, as "commerce," is defined in the Federal Trade Commission Act, do forthwith cease and desist from:

A. Representing, directly or by implication, that

(1) The use of the product or service will prevent, cure, relieve, reverse, or reduce hair loss; or

(2) The use of the product or service will promote the growth of hair where hair already has been lost,

unless, at the time of making such representation, respondents possess and rely upon competent and reliable scientific evidence that substantiates the representation.

B. Manufacturing, advertising, labeling, packaging, promoting, offering for sale, selling, or distributing any product that is represented as promoting hair growth or preventing hair loss, unless the product is the subject of an approved new drug application for such purpose under the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. 301 *et seq.*, provided that, this requirement shall not limit the requirements of order paragraphs III or IV.A. herein.

V.

It is further ordered, That respondents, their successors and assigns, and their officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division or other device, in connection with the manufacturing, advertising, labeling,

packaging, offering for sale, sale, or distribution of any product in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from making any representation, directly or by implication, that any such product:

A. Cures, treats, prevents, or reduces the risk of developing any disease, disorder or condition in humans or relieves symptoms thereof;

B. Provides any weight loss or weight control benefit or otherwise provides an effective treatment for obesity;

C. Suppresses appetite, reduces the body's absorption of calories, stimulates metabolism, or reduces serum cholesterol;

D. Cures, treats, prevents, or reduces the risk of benign prostatic hypertrophy;

E. Promotes greater muscular development, endurance, strength, power, definition, or stamina, or shorter exercise recovery or recuperation time in a user than a non-user of such product;

F. Removes or diminishes dark circles under the eyes;

G. Improves mental clarity, mental concentration, mental comprehension, mental retention or mental alertness;

H. Aids digestion or promotes increased absorption of nutrients from ingested foods;

I. Relieves stress or promotes relaxation; or

J. Prevents, relieves or treats fatigue or boosts energy;

unless, at the time of making such representation, respondents possess and rely upon competent and reliable scientific evidence that substantiates the representation.

Provided, however, that respondents shall not be liable under this paragraph for any representation contained on a package label or package insert for a product that meets all of the following conditions:

1. The product is manufactured and distributed by a third party and is not manufactured or distributed exclusively for respondents;
2. The product is generally available at competing retail outlets;
3. The product is not identified with respondents and does not contain respondents' names or logos;
4. The product was not developed or manufactured at the instigation or with the assistance of respondents; and,

5. The pro promoted by re

Provided f currently ider paragraph V. 9175, entered the order here: except upon r herein and ma law or fact or herein by the subsequent n proviso in Do of the instant

It is furt respondents, representativ subsidiary, c that is spe regulations i pursuant to moreover, 1 successors a employees, or other dev permitted i standard pr any new Administr

It is fi assigns, a directly o device, in

5. The product representation is not otherwise advertised or promoted by respondents.

Provided further, that the proviso in the preceding paragraph is currently identical to the "safe harbor" proviso contained in paragraph V. of the order in General Nutrition, Inc., Docket No. 9175, entered February 2, 1989. It is the intention of the parties to the order herein that the provisos shall remain identical. Therefore, except upon respondents filing a petition to reopen the proceeding herein and making a satisfactory showing that changed conditions of law or fact or the public interest warrants modification of the order herein by the Commission, respondents agree to be bound by any subsequent modifications (including vacation) of the safe harbor proviso in Docket No. 9175, without any further formal modification of the instant order.

VI.

It is further ordered, That nothing in this order shall prohibit respondents, their successors and assigns, and their officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division or other device, from making any representation that is specifically permitted in labeling for any product by regulations promulgated by the Food and Drug Administration (FDA) pursuant to the Nutrition Labeling and Education Act of 1990; moreover, nothing in this order shall prohibit respondents, their successors and assigns, and their officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division or other device, from making any representation for any drug that is permitted in labeling for any drug under any tentative final or final standard promulgated by the Food and Drug Administration, or under any new drug application approved by the Food and Drug Administration.

VII.

It is further ordered, That respondents, their successors and assigns, and their officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division or other device, in connection with the manufacturing, advertising, labeling,

packaging, offering for sale, sale, or distribution of any product in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from:

1. Using the name "Sleeper's Diet" or any other brand name that represents, directly or by implication, that such product has the ability to promote weight loss during sleep;

2. Using the name "Memory Booster" or any other brand name that represents, directly or by implication, that such product improves memory retention;

3. Using the name "Dark Circle Eye Treatment" or any other brand name that represents, directly or by implication, that such product removes dark circles from under the eyes; or

4. Using the name "Super Fat Burners" or any other brand name that represents, directly or by implication, that such product reduces body fat

unless, at the time of making such representation, respondents possess and rely upon competent and reliable scientific evidence that substantiates the representation.

VIII.

It is further ordered, That respondents, their successors and assigns, shall pay to the Federal Trade Commission, by cashier's check or certified check made payable to the Federal Trade Commission and delivered to the Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 6th and Pennsylvania Ave., NW, Washington, DC, the sum of two hundred and fifty thousand dollars (\$250,000). Respondents shall make this payment on or before the tenth day following the date of issuance of this order. In the event of any default on any obligation to make payment under this section, interest, computed pursuant to 28 U.S.C. 1961(a), shall accrue from the date of default to the date of payment. The funds paid by respondents shall, in the discretion of the Federal Trade Commission, be used to provide direct redress to consumers allegedly injured by respondents in connection with the acts or practices alleged in the complaint, and to pay any attendant costs of administration. If the Federal Trade Commission determines, in its sole discretion, that redress to consumers is impracticable or

unwarranted
United States
funds are
distributed

It is further ordered,
dissemination
respondents
request
inspection

1. A material
2. A substantiated
3. A evidence
into question
relied upon

It is further ordered,
service of process
assigns, successors
days prior to
dissolution of
successors
any other
obligations

It is further ordered,
of this complaint
officers, preparatory
product

unwarranted, any funds not used for redress shall be paid to the United States Treasury. Respondents shall be notified as to how the funds are distributed, but shall have no right to contest the manner of distribution chosen by the Commission.

IX.

It is further ordered, That, for five (5) years after the last date of dissemination of any representation covered by this order, respondents, or their successors and assigns, shall maintain and upon request make available to the Federal Trade Commission for inspection and copying:

1. All labeling, packaging, advertisements and promotional materials setting forth any representation covered by this order;
2. All materials that were relied upon by respondents to substantiate any representation covered by this order; and
3. All test reports, studies, surveys, demonstrations or other evidence in their possession or control that contradict, qualify, or call into question such representation or the basis upon which respondents relied for such representation, including complaints from consumers.

X.

It is further ordered, That for a period of ten (10) years after service upon them of this order, respondents, their successors and assigns, shall notify the Federal Trade Commission at least thirty (30) days prior to any proposed change in the respondents such as dissolution, assignment, or sale resulting in the emergence of a successor corporation, the creation or dissolution of subsidiaries or any other change in the corporations that may affect compliance obligations arising under this order.

XI.

It is further ordered, That the respondents shall distribute a copy of this order to each of their operating divisions, to each of their officers, agents, representatives, or employees engaged in the preparation and placement of advertisements, promotional materials, product labels or other such sales materials covered by this order, and

Statement

120 F.T.C.

to all distributors of products manufactured or marketed by respondents.

XII.

It is further ordered, That respondents shall, within sixty (60) days after service of this order, file with the Commission a report, in writing, setting forth in detail the manner and form in which they have complied or intend to comply with this order.

Commissioner Azcuenaga dissenting.

STATEMENT OF COMMISSIONER MARY L. AZCUENAGA

I dissent from the Commission's decision to issue a final decision and order against Nature's Bounty and its subsidiaries, Puritan's Pride, Inc., and Vitamin World, Inc., because the order leaves the respondents free to sell products they know, or should know, are deceptively labeled.

The proviso in paragraph V of the order states that the respondents would not necessarily be liable for false or unsubstantiated claims appearing on the labels or in the packaging of the products sold at its stores, even if it were clear that the companies had actual knowledge that those claims were unsubstantiated or untrue. I believe that the order should have provided that the respondents would be liable if they know, or should know, that the labels or packaging of any such product contains false or unsubstantiated claims.

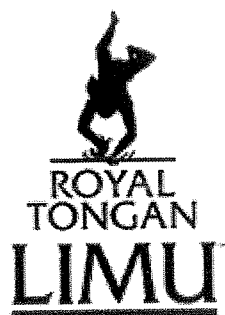
CON

D

This con
phar
Syst
Phar
obje
ensu
Eli
form
form
Eli I
agre
prot
info
drug

For
For
N.Y.

The
respon
the juri
McKes
Federa
pursua
offer to
intende
cash te
would,



[Home](#)
[Product](#)
[Opportunity](#)
[Company](#)
[News & Events](#)
[Members](#)
[International](#)

Product



[Limu Moui Research](#)

[What Physicians Are Saying](#)

[Royal Tongan Limu™ Video](#)

[Frequently Asked Questions](#)

[Limu Moui Reference](#)

[Product Certifications](#)

[Buy Now](#)

[Join Now](#)

Sharing the Story of ROYAL TONGAN LIMU™.

Journey back in time over 3,000 years ago, when the early Polynesians from Fiji first reached the beautiful islands of Tonga in the South Pacific. Listen to the gentle, soothing sounds of the waves as they wash upon the purest sand you've ever seen. Take in a deep, refreshing breath of clean, healthy air. Dive into the crystal clear water and witness the angelic dance of life nurtured on the ocean floor. It is in this underwater oasis, nourished by Mother Nature's purest form of energy, that Limu Moui is born.

Sharing the Secret

Until recently, only the Tongan people knew of the ancient, health supporting secret ingredient that is Limu Moui. Intrigued by the fact that native Tongans live robust, healthy lives free from disease associated with aging, generation after generation, Robert Silverman, Vice President of Product Development for NBTY, the largest American-owned manufacturer of nutritional products in the world, traveled to the Kingdom of Tonga to learn more. What he found amazed him.

The Key to nofo fiefia (living happily) is Limu Moui.

Sharing the Science

In addition to the usual health-giving vitamins, minerals, amino acids and antioxidants found in fruits and vegetables, Limu Moui also contains several other powerful nutrients such as polyphenols, glyconutrients, alginate and more. But of the 77-plus beneficial substances found in Limu Moui the most exciting is fucoidan, which is cited in more than 500 scientific studies in the U.S. National Library of Medicine's PubMed database. According to prominent Japanese researcher Dr. Kyosuke Owa, fucoidan is said to "contain the same healing antibodies found in mother's milk, providing essential amino acids and a balanced diet of minerals necessary to boost the immune system." *



Sharing ROYAL TONGAN LIMU™ with the World, One Person at a Time.

Using the all-natural Limu Moui, the first and only ROYAL TONGAN LIMU™ was developed and introduced by Dynamic Essentials. Now you too can share this gift from the sea with your family and friends.


Discover the message in our bottle and how it can have a dramatic impact on your life and the lives of those you care about. It is our privilege, our obligation, and our mission to pass this on to you.

*These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

Exhibit B-1

Copyright 2002 Dynamic Essentials

■ Select a Language ■

 Print Version



Home Product Opportunity Company News & Events Members International

Product

Sharing Limu Moui Research

Why do thousands of people swear by Royal Tongan Limu™ in their quest for optimal health? And why has Limu Moui been reported to fight a number of different diseases?

The answer lies in the unique nutritional make-up of the mysterious Limu Moui seaweed...

In addition to the usual health-giving vitamins, minerals, amino acids and antioxidants found in fruits and vegetables, Limu Moui also provides several other powerful nutrients such as polyphenols, glyconutrients, alginate and more. But of the 77-plus beneficial substances found in Limu Moui, the most exciting is fucoidan.

What is Fucoidan?

Fucoidan is a uniquely-structured sulfated polysaccharide (complex carbohydrate molecule) that is found in the cell walls of several types of brown seaweed, but not land plants. Its moisturizing property is what gives these seaweeds their slippery, sticky texture. Fucoidan is found in high concentrations within the cell walls of Limu Moui.

What Does Fucoidan Do?

Laboratory studies show that fucoidan provides functional support to the immune system in a multitude of different ways. A robust immune system is the key to optimal health.*

Here are just a few findings of the 500-plus studies involving fucoidan that are listed in the National Library of Medicine's PubMed database at www.pubmed.gov...

- A Japanese study (1) found that fucoidan enhanced phagocytosis, the process whereby your white blood cells engulf, kill, digest and eliminate harmful invaders such as viruses or bacteria.*
- An Argentinian study (2) and a Japanese study (3) found that fucoidan inhibited viruses such as herpes simplex type 1 from attaching to, penetrating and replicating in host cells.*
- An American study (4) reported that fucoidan increases the number of circulating mature white blood cells. White blood cells are an integral part of the immune system and play many vital roles in protecting the body.*
- A Swedish study (5) is among many finding that fucoidan inhibits the cascading of inflammation which may lead to allergies and tissue damage. Other studies like one in Canada (6) found that fucoidan blocks a process called 'complement activation' that is believed to play an adverse role in chronic degenerative diseases such as atherosclerosis, myocardial infarction and Alzheimer's disease.*
- Two American studies (4, 7) found that fucoidan increases and mobilizes stem cells. Stem cells have the potential to become any one of the 200 types of cells. They enable your body to replace dead cells, thereby enabling tissue and organ regeneration and slowing down the aging process.*
- A Spanish study (8) found that polysaccharides and proteins in a brown seaweed of the same class as Limu Moui caused a significant reduction in the blood glucose. It is also interesting to note that Tongans are



known for their comparatively low incidences of both high blood pressure and high cholesterol.*

It is important to understand that while fucoidan itself does not prevent or cure any type of disease, it may do something far more powerful...provide the extra nutritional fuel that your overworked immune system so badly needs in today's polluted, toxic world.*

*These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

References

1. Itoh H, Noda H, Amano H, Zhuaung C, Mizuno T and Ito H. Antitumor Activity and Immunological Properties of Marine Algal Polysaccharises, Especially Fucoidan, Prepared from *Sargassum Thumbergii* of Phaeophyceae. *Anticancer Research*, Nov-Dec 1993, 13(6A): 2045-52
2. Feldman SC, Reynaldi S, Stortz CA, Cerezo AS, Damont EB. Antiviral properties of fucoidan fractions from *Leathesia difformis*. *Phytomedicine*, Nov 1999, 6(5): 335-40
3. Hoshino T, Hayashi T, Hayashi K, Hamada J, Lee JB, Sankawa U. An antivirally active sulfated polysaccharide from *Sargassum horneri* (TURNER) C. AGARDH. *Biological & Pharmaceutical Bulletin*, Jul 1998, 21 (7): 730-4
4. Sweeney EA, Lortat-Jacob H, Priestley GV, Nakamoto B, Papayannopoulou T. Sulfated polysaccharides increase plasma levels of SDF-1 in monkeys and mice: involvement in mobilization of stem/progenitor cells. *Blood*, Jan 1 2002, 99(1): 44-51
5. Granert C, Raud J, Lindquist L. The polysaccharide fucoidin inhibits the antibiotic-induced inflammatory cascade in experimental pneumococcal meningitis. *Clinical and Diagnostic Laboratory Immunology*, May 1998, 5 (3): 322-4
6. Klegeris A, Singh EA, McGeer PL. Effects of C-reactive protein and pentosan polysulphate on human complement activation. *Immunology*, July 2002, 106(3): 381-8
7. Frenette PS, Weiss L. Sulfated glycans induce rapid hematopoietic progenitor cell mobilization: evidence for selectin-dependent and independent mechanisms. *Blood*, 2000 Oct 1, 96(7): 2460-8
8. Lamela M, Anca J, Villar R, Otero J, Calleja JM. Hypoglycemic activity of several seaweed extracts. *Journal of Ethnopharmacology*, Nov 1989, 27 (1-2): 35-43

[Home](#) [Product](#) [Opportunity](#) [Company](#) [News & Events](#) [Members](#) [International](#)

Product

Sharing What Physicians Are Saying

Dr. Kyosuke Owa on Fucoidan

According to prominent Japanese researcher Dr. Kyosuke Owa, the Limu Moui sea plant has "immune systems within it with exactly the same type of antibodies as in human mother's milk." By digesting Fucoidan, the main ingredient in Limu Moui, we can "provide our bodies with a balanced diet of minerals, various amino acids including essential amino acids and thereby take in nutrients to boost our immune system in a similar way as mother's milk does."

For centuries, the people of Tonga have benefited from the amazing health properties of Limu Moui. Now, thanks to Dr. Owa's extensive research on Fucoidan, it becomes clear why it is our mission to share ROYAL TONGAN LIMU™ with the world.

Dr. Derrick M. DeSilva, Jr., M.D.

Nationally recognized as an expert in the vital area of nutrition as it relates to health, Dr. DeSilva maintains that disease is caused by nutrient deficiency brought on by such factors as poor diets, depleted nutrients in food, dieting, medications, oxidation and stress.

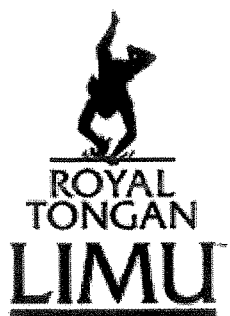
Because Limu Moui, the key ingredient in ROYAL TONGAN LIMU™, absorbs a rich bounty of 77+ nutrients from pristine ocean waters, Dr. DeSilva truly believes that it's the "PERFECT FOOD." Dr. DeSilva also emphasizes the importance of fucoidan's potential benefits to the immune system.*

* These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.



Copyright 2002 Dynamic Essentials

[Select a Language](#)[Print Version](#)



[Home](#) [Product](#) [Opportunity](#) [Company](#) [News & Events](#) [Members](#) [International](#)

Product

Sharing What Others Are Saying

Fucoidan, which occurs abundantly in Limu Moui, is cited in more than 500 studies in the National Medical Library's PubMed database at www.pubmed.gov.

[Limu Moui Research](#)

[What Physicians Are
Saying](#)

[Royal Tongan Limu™
Video](#)

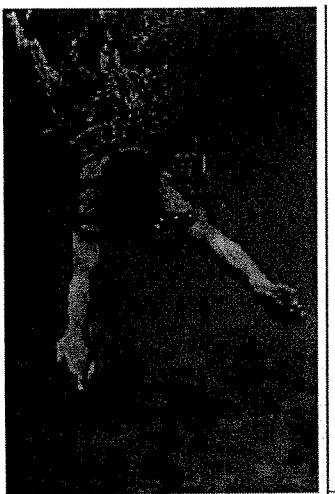
[Frequently Asked
Questions](#)

[Limu Moui Reference](#)

[Product Certifications](#)


[Buy Now](#)

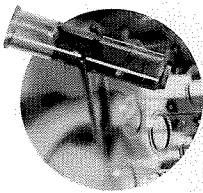
[Join Now](#)



Copyright 2002 Dynamic Essentials

■ [Select a Language](#) ■

 [Print Version](#)



Fucoidan

The Secret That Makes Royal Tongan Limu™ Unique

It has long been known that the people of Tonga enjoy the kind of health and vitality most of us can only dream about. Now, thanks to Royal Tongan Limu™, you too can take advantage of the secret to their extraordinary health! But what is it that makes this amazing product so powerful? Here's a hint ... it's all about the immune system!

Fucoidan

(foo-côy-den)

A healthy immune system is your single most powerful weapon against premature aging and disease

The Driving Force Behind Royal Tongan Limu™

Virtually everyone has the genetic potential to enjoy robust health for well over 100 years, but unfortunately most people's bodies begin breaking down long before that. That's because in today's 'man-made' environment, your immune system has to constantly fend off far more toxins, pollutants, food additives, chemicals and other stress factors than nature designed it for. Unless you constantly replenish your immune system with extra fuel, it remains dangerously overloaded year after year and eventually begins to malfunction. That's where Royal Tongan Limu™, a unique nectar based on a seaweed extract from the pristine waters of Tonga, can make a difference in your life!

In addition to the usual health-giving vitamins, minerals, amino acids and antioxidants found in fruits and vegetables, Royal Tongan Limu™ also provides several other powerful nutrients such as polyphenols, glyconutrients, alginate and more. But of the 70-plus beneficial substances found in Royal Tongan Limu™, the most exciting is fucoidan.



Make A Difference In Your Life Today!



To Order, Call (877) 746-9334
Be sure to ask about our discount programs and 30-day money-back guarantee!

Referral ID#



Dynamic Essentials Inc.
255 Primera Boulevard, Suite 500.
Lake Mary, Florida 32746
www.dynamicessentials.com

The references shown below are for the studies listed in this brochure. Remember they are just some of the studies that have been conducted involving fucoidan that are listed in the National Library of Medicine's PubMed database at www.pubmed.org

1. Itoh H, Noda H, Amano H, Zhuang C, Mizuno T, and Ito H. Antitumor Activity and Immunological Properties of Marine Algal Polysaccharides, Especially Fucoidan, Prepared from Sargassum Thunbergii of Phaeophyceae. *Anticancer Research*, Nov-Dec 1993, 13(6A): 2045-52
2. Feldman SC, Reinaldi S, Stortz CA, Cerezo AS, Damont EB. Antitumor properties of fucoidan fractions from *Leathesia difformis*. *Phytomedicine*, Nov 1999, 6(6): 335-40
3. Hoshino T, Hayashi T, Hayashi K, Hamada J, Lee JB, Sankawa U. An antitumorally active sulfated polysaccharide from *Sargassum horneri* (TURNER) C. AGARDH. *Biological & Pharmaceutical Bulletin*, Jul 1998, 21(7): 730-4
4. Sweeney EA, Lortat-Jacob H, Priestley GV, Nakamoto B, Papayannopoulos T. Sulfated polysaccharides increase platelet aggregation and inhibit platelet-derived factor-1 in monkeys and mice: involvement in mobilization of stem/progenitor cells. *Blood*, Jan 1 2002, 99(1): 44-51
5. Granet C, Rud J, Lindquist L. The polysaccharide fucoidan inhibits the antibiotic-induced inflammatory activation of human neutrophils. *Clinical and Diagnostic Laboratory Immunology*, May 1998, 5(3): 322-4
6. Vignarola A, Singh EA, McGraw PL. Effects of C-reactive protein and pentosan polysulphate on human complement activation. *Immunology*, Jul 2002, 106(3): 381-8
7. Fournier PS, Weiss L. Sulfated glycans induce rapid hematopoietic progenitor cell mobilization: evidence for selectin-dependent and independent mechanisms. *Blood*, Oct 1 2000, 96(7): 2460-8
8. Lemell M, Aaga J, Villor B, Otero J, Calleja JM. Hypoglycemic activity of several seaweed extracts. *Journal of Ethnopharmacology*, Nov 1999, 21(1-2): 35-43

Item# 20724 (03/03)

©2003 Dynamic Essentials DEI Inc. All Rights Reserved

Discover The Secret of Royal Tongan Limu™



Making a difference!

Making a Difference in Your Life!

Reduced to 65% of original size

Exhibit B-2

RESEARCH

Fucoidan is a unique substance that has been the subject of more than 500 research studies published in such highly respected publications as the Journal of Molecular Immunology, Anticancer Research, the British Journal of Pharmacology, and Infectious Immunology to name just a few. Laboratory studies show that fucoidan provides functional support to the body's immune system in a multitude of different ways. It is therefore not surprising that fucoidan studies report such a wide variety of benefits.



Based on the results of more than 500 clinical studies, **fucoidan** is possibly the most exciting immune-supporting nutrient ever discovered!

Fucoidan

Possibly Nature's Most Powerful Health Secret!

What is Fucoidan? Fucoidan is a uniquely-structured sulfated polysaccharide, a complex carbohydrate molecule that is found in the cell walls of several types of brown seaweed (but not in land plants). Its moisturizing property is what gives these seaweeds their slippery, sticky texture. Fucoidan is found in especially high concentrations in the cell wall of a brown seaweed known as *limu moui*. Researchers have likened the chemical composition of fucoidan to that of the most perfect immune-supporting food we know of ... human mothers' breast milk!

*These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease or illness.

Royal Tongan Limu™ An Exceptional Source of Fucoidan

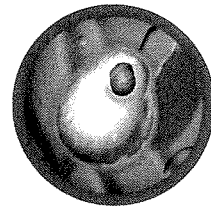
Royal Tongan Limu™ is a concentrated extract of *limu moui*, a brown seaweed that carries an exceptionally high fucoidan content even before the extraction/concentration process begins! The *limu moui* is harvested in its natural state from the pristine waters of Tonga, arguably the purest location in the world. It is important to note that seaweeds absorb all of the elements, both good and bad, that are present in the waters they grow in. Whereas waters in certain other areas of the world can contain toxic heavy metals, regular testing shows that *limu moui* used in Royal Tongan Limu™ contains no such substances.



difference!

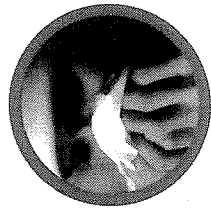
What would you prefer as you grow older ... a vibrant, healthy lifestyle for many years to come, or a hopeless daily struggle against premature aging and disease? An ounce of prevention is worth a pound of cure, and a healthy immune system is without a doubt your single most powerful weapon against premature aging and disease. Give yourself the whole-food supplement you need ... order your Royal Tongan Limu™ today!

What Does Fucoidan Do? Here are just a few findings from the 500-plus studies involving fucoidan that are listed in the National Library of Medicine's PubMed database at www.pubmed.org



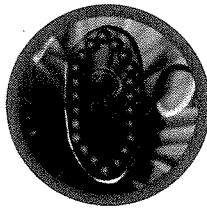
Enhances Phagocytosis

A Japanese study (1) found that fucoidan enhanced phagocytosis, the process whereby your white blood cells engulf, kill, digest and eliminate harmful invaders such as viruses or bacteria.



Inhibits Excessive Inflammation

A Swedish study (5) is among many findings that fucoidan inhibits the cascading of inflammation which may lead to allergies and tissue damage. Other studies like one in Canada (6) found that fucoidan blocks a process called 'complement activation' that is believed to play an adverse role in chronic degenerative diseases such as atherosclerosis, myocardial infarction and Alzheimer's disease.



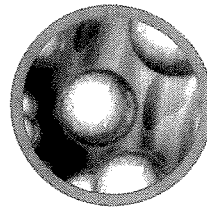
Inhibits Viruses

An Argentinian study (2) and a Japanese study (3) both found that fucoidan inhibited viruses such as herpes simplex type 1 from attaching to, penetrating and replicating in host cells.



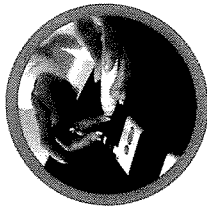
Mobilizes Stem Cells

Two American studies (4, 7) found that fucoidan increases and mobilizes stem cells. Stem cells have the potential to become any one of 200 types of cells in the human body. They enable your body to replace dead cells, thereby enabling tissue and organ regeneration and slowing down the aging process.



Increases Blood Cells

An American study (4) reported that fucoidan increases the number of circulating mature white blood cells. White blood cells are an integral part of the immune system and play many vital roles in protecting the body.



May Reduce Blood Glucose

A Spanish study (8) found that polysaccharides and proteins in a brown seaweed of the same class as *limu moui* caused a significant reduction in the level of blood glucose. It is also interesting to note that Tongans are known for their relatively low incidences of both high blood pressure and high cholesterol.

It is important to understand that while fucoidan itself does not prevent or cure any type of disease, it may do something far more powerful ... provide the extra nutritional fuel that your overworked immune system so badly needs in today's polluted, toxic world.

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. C3593

TITLE NATURE'S BOUNTY, INC., ET AL.

**DATE RECORDED: DATE UNKNOWN
TRANSCRIBED: NOVEMBER 14, 2003**

PAGES 1 THROUGH 11

**VIDEOTAPE - DISCOVERY A GIFT FROM THE SEA...
ROYAL TONGAN LIMU**

**FOR THE RECORD, INC.
603 POST OFFICE ROAD, SUITE 309
WALDORF, MARYLAND 20602
(301)870-8025**

FEDERAL TRADE COMMISSION

I N D E XVIDEOTAPE:PAGE:

Discover a Gift from the Sea

3

FEDERAL TRADE COMMISSION

In the Matter of:)
Nature's Bounty, Inc., et al.) Matter No. C3593
)
-----)

Date Unknown

The following transcript was produced from a
live tape provided to For The Record, Inc. on November 7,
2003.

For The Record, Inc.
Waldorf, Maryland
(301) 870-8025

P R O C E E D I N G S

VIDEOTAPE - DISCOVER A GIFT FROM THE SEA

ROYAL TONGAN LIMU

ON SCREEN: "The Waves"

The sea isn't a place. . .

but a fact and a mystery.

- Mary Oliver

MALE NARRATOR: There's something very special about the ocean. Its intriguing mystery, its purity, its ability to sustain and nourish life. Is it any wonder that the secret ingredient to overall health and well-being has been found cradled in an underwater oasis in the ocean waiting to be discovered by the world?

ON SCREEN: Robert Silverman

V.P. of Product Development, NBTY

MALE NARRATOR: Mr. Robert Silverman has been searching for life-changing products for almost two decades. It has been his life's mission to bring the world alternative nutritional products that can actually change lives.

Intrigued by the fact that Tongans have one of the lowest disease and death rates in the world, Mr. Silverman visited the islands in an effort to find out how the Tongans live so well and remain so healthy and

1 vital generation after generation.

2 (Scenes of Tongan Islands)

3 ROBERT SILVERMAN: Tonga is one of the most
4 beautiful places on the planet. You have never seen
5 bluer water, the palm trees swaying. It's just an
6 incredible sight to behold.

7 (Scenes of Tongan Islands)

8 MALE NARRATOR: Considered the most pristine
9 place on the planet, the Kingdom of Tonga is unlike any
10 other place on earth. The day literally begins and ends
11 in Tonga first.

12 (Scenes of Tongan natives)

13 MALE NARRATOR: As the sun rises before
14 anywhere else on the planet, these pristine islands are
15 awakened by its glorious light. One might say it's an
16 island of new beginnings.

17 ROBERT SILVERMAN: While in Tonga, I was
18 complimenting somebody on their abundance of energy and
19 they actually shared back with me the secret of their
20 energy. It's a Tongan tradition to -- when somebody
21 compliments you to share back with the person giving the
22 compliment something relating to the compliment, which is
23 the Limu, which they eat as part of their diet every day,
24 and they have for centuries as have all of their
25 ancestors.

(Scenes of Tongan natives)

MALE NARRATOR: Traditionally known to the Tongans as Limu Moui or sea plant, this incredible gift from the sea packs health-supporting properties known to increase longevity and improve overall wellness. Growing in dense underwater forests, Limu Moui has been found to be a veritable storehouse of natural minerals, vitamins, glyconutrients, amino acids and polysaccharides that may just help support immune function.

ON SCREEN: 3000 year old Secret Revealed

MALE NARRATOR: A 3,000-year-old secret revealed.

MALE TONGAN: Ever since I was a little boy, I've eaten Limu. My parents, my grandparents and everyone that I know have eaten Limu. That's why we're so healthy and live longer and stronger because of the Limu.

FEMALE TONGAN: When I was a little child, my mom always bring me the Limu or the seaweed for me for (inaudible) and lunch and I feel that I look beautiful, I feel healthy, I feel strong because it's very healthy. It also makes me look nice and beautiful.

ON SCREEN: Dr. Mumui Tatola, M.D.

DR. MUMUI TATOLA: It's very good for the health. It's very important for the Western World to do

1 it because it's very good for their health. I have no
2 doubt in my mind that my parents and grandparents were
3 living very well and lived longer because it's the Limu.

4 (Scene of Tongas on beach with Limu)

5 MALE NARRATOR: But what is it that makes this
6 mysterious sea plant so unique?

7 ON SCREEN: Furoidan

8 MALE NARRATOR: Furoidan, the main ingredient
9 in Limu Moui. According to prominent Japanese
10 researcher, Dr. Kyosuke Owa, Furoidan --

11 ON SCREEN: "...contain the same healing
12 antibodies as mother's milk, providing essential amino
13 acids and a balanced diet of minerals necessary to boost
14 the immune system."

15 - Dr. Kyosuke Owa

16 MALE NARRATOR: -- contains the same type of
17 antibodies found in human mother's milk, thereby
18 providing essential nutrients to boost the immune system.
19 And it has been known since the beginning of time that a
20 mother's milk is the best source of nutrients for her
21 baby.

22 Drinking his or her mother's milk is critical
23 to building the baby's immune system. You might say it's
24 the healthiest and purest source of food on earth.

25 According to Dr. Owa, Furoidan encourages the

1 regeneration of used cells, increasing cellular immunity
2 and giving the body additional firepower against
3 diseases. This is because Fucoidan not only aids in the
4 development of new cells, but it encourages the
5 regeneration of what are called natural killer cells.
6 These cells are found on the front lines, defending our
7 bodies from disease.

8 Limu Moui, a 3,000-year-old secret, perhaps the
9 key to long life and vitality for native Tongans, and
10 now, your key.

11 **(Scenes in a laboratory)**

12 MALE NARRATOR: After months of rigorous
13 testing in our state-of-the-art research facilities in
14 Bohemia, New York, thousands upon thousands of man hours
15 formulating, extracting and processing the virgin sea
16 plants, we at Dynamic Essentials are proud to present a
17 product that has captured our hearts and dreams, a
18 product called Royal Tongan Limu.

19 Royal Tongan Limu, a life-changing nectar that
20 has the potential to enhance the lives of --

21 **ON SCREEN: Millions**

22 MALE NARRATOR: -- millions around the world,
23 young, old, male, female, athletes, retirees, anyone and
24 everyone who tries this incredible nectar can benefit
25 from it, just as the Tongans have for 3,000 years.

1 It was this zeal, this commitment that led
2 Dynamic Essentials --

3 **ON SCREEN: Gary J. Raser**

4 **President, Dynamic Essentials, Inc.**

5 **MALE NARRATOR:** -- and its president, Mr. Gary
6 Raser, to spare no expense in the harvesting, processing
7 and marketing of this product to the world. Because with
8 such a life-changing, life-enhancing product, it would be
9 a sin not to share it.

10 **ON SCREEN: His Majesty, King T'auafa'ahau Tupou**

11 **IV**

12 **MALE NARRATOR:** It was because of this
13 commitment that the Kingdom of Tonga has given us their
14 approval for harvesting the purest form of Limu Moui
15 available.

16 **ON SCREEN: Certified**

17 **Royal Tongan**

18 **100 %**

19 **Royal Tongan Limu**

20 **100%**

21 **ROBERT SILVERMAN:** While in Tonga, I had the
22 opportunity to meet with the Prime Minister --

23 **ON SCREEN: Prince Ulukalala Lavaka Ata**

24 **Prime Minister of Tonga**

25 **ROBERT SILVERMAN:** -- and he was so pleased

1 that we were there to share the secrets that the Tongans
2 have known about for centuries with the world.

3 **ON SCREEN: dei**

4 **an NBTY subsidiary**

5 **MALE NARRATOR:** The Tongan people believe
6 wholeheartedly in our dream to share their secret with
7 the world.

8 **ON SCREEN: One person at a time.**

9 **ON SCREEN: dei**

10 **an NBTY subsidiary**

11 **MALE NARRATOR:** And so, the DEI team has
12 accepted the responsibility, and our message, our mission
13 is simple, to share Royal Tongan Limu with the world, one
14 person at a time. For the message in our bottle, we
15 believe, truly represents the most precious gift of
16 health. Royal Tongan Limu, directly from the Kingdom of
17 Tonga, the pristine islands of the South Pacific is --

18 **ON SCREEN: Exclusively**

19 **MALE NARRATOR:** -- exclusively available from
20 Dynamic Essentials.

21 **ON SCREEN: Privilege**

22 **MALE NARRATOR:** It was our privilege to have
23 learned the secret of Limu Moui, a truly life-enhancing
24 ingredient from the Kingdom of Tonga.

25 **ON SCREEN: Obligation**

1 MALE NARRATOR: It became our obligation to
2 harvest, process and formulate Limu Moui into Royal
3 Tongan Limu, an exclusive product that benefits people of
4 all ages.

5 **ON SCREEN: Mission**

6 MALE NARRATOR: It is our mission to share
7 Royal Tongan Limu with the world as the most dynamic
8 essential you can provide your body. We encourage you to
9 try Royal Tongan Limu and find out for yourself what an
10 extraordinary discovery this truly is.

11 This is our mission, to share Royal Tongan Limu
12 with the world, one person at a time.

13 **ON SCREEN: Royal Tongan Limu**

14 MALE NARRATOR: Will you make it yours?

15 **ON SCREEN: Royal Tongan Limu**

16 MALE NARRATOR: To purchase your first bottle
17 of this life-changing product, please contact the person
18 who gave you this tape.

19 **ON SCREEN: Royal Tongan Limu**

20 Pass it on...

21 MALE NARRATOR: Royal Tongan Limu, pass it on.

22 **ON SCREEN: ©2001 Dynamic Essentials, Inc.**

23 **(The videotape was concluded.)**

C E R T I F I C A T I O N O F T Y P I S T

MATTER NUMBER: C3593

CASE TITLE: NATURE'S BOUNTY, INC., ET AL.

TAPING DATE: DATE UNKNOWN

TRANSCRIPTION DATE: NOVEMBER 14, 2003

I HEREBY CERTIFY that the transcript contained herein is a full and accurate transcript of the tapes transcribed by me on the above cause before the FEDERAL TRADE COMMISSION to the best of my knowledge and belief.

DATED: NOVEMBER 14, 2003

Elyse M Farrell

ELIZABETH M. FARRELL

C E R T I F I C A T I O N O F P R O O F R E A D E R

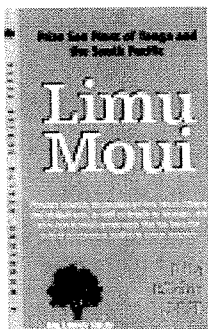
I HEREBY CERTIFY that I proofread the transcript for accuracy in spelling, hyphenation, punctuation and format.

Walter D. Jones

KATHY J. DE MENT

LIMU MOUI REFERENCE MATERIALS

Compelling Scientific Documentation
on the Efficacy of Limu Moui



"LIMU MOUI"

Booklet & Audio Tape...By Rita Elkins, MH

The booklet and audio tape by Nutritional Researcher and Expert, **Rita Elkins, M.H.**, contain information on over 300 Scientific Studies that verify the amazing health benefits of *limu moui* and its key ingredient, *fucoïdan*. Rita Elkins also lists over 50 medical conditions this amazing sea plant addresses.

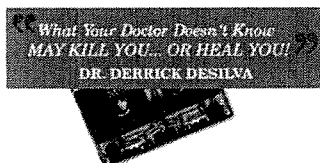
<u>Qty.</u>	<u>Price</u>	<u>Qty.</u>	<u>Price</u>
*Each Booklet (25-99).....	\$1.75	Each Audio (25-99).....	\$0.75
(100+)....	\$1.50	(100+)....	\$0.50

** Available in English and Spanish*

***"WHAT YOUR DOCTOR DOESN'T KNOW MAY KILL YOU...
...OR HEAL YOU"***

&

"THINK YOUR DR KNOWS EVERYTHING...THINK AGAIN!"



Audio Tapes...By Dr. Derrick DeSilva, Jr.

In these powerful audio tapes, **Dr. Derrick DeSilva, Jr.**, Prominent Physician, Practicing Internist, Attending Staff Member of Raritan Bay Medical Center, Teaching Staff Member of JFK Medical Center, Author, National Radio Talk Show Host, TV Personality, and President of the Nutraceutical Association endorses **Royal Tongan Limu™**, calling it "*the perfect food*" and stating that "*anyone who is breathing should take it!*" In addition, each tape contains remarkable product testimonials from satisfied users.

<u>Qty.</u>	<u>Price</u>
Each Audio (25)	\$1.00
(100).....	\$0.70

The **Only** Source for these Phenomenal Reference Materials is
VIDEO PLUS

(800) 234-6488 / www.limumouitools.com

Exhibit B-4

"Health Watch Vol.27 #1"

Testimonial newspaper on Royal Tongan Limu Moui*



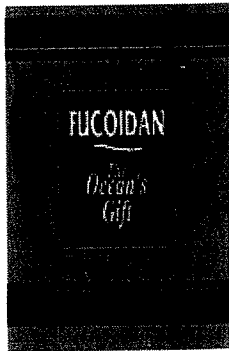
As Limu Moui becomes more and more popular as a health supplement in today's world, so does the interest in one of the plant's main ingredients—fucoidan. In Health Watch 27.1, read how fucoidan has been the focus of scientific study in hundreds of laboratories around the world. Fucoidan has been shown to be an important cell-building compound, and it may be important to those seeking relief from conditions such as cancer, arthritis, diabetes, and more. In the updated HealthWatch, find two new articles focusing more on fucoidan and the other 77 nutrients that have been found in Limu Moui. You will also find a new testimonial from a doctor whose answer to better health for his patients is Limu Moui.

<u>Qty.</u>	<u>Price</u>
(50).....	\$13.00
(100).....	\$23.00

**Available in English and Spanish*

"Fucoidan – The Ocean's Gift"

48-page booklet on the element that makes Limu Moui so powerful - fucoidan



For centuries, plant life on the ocean's floor has sparked curiosity. This curiosity, however, is turning into knowledge because of the advances in oceanic science. Limu Moui, a sea plant native to the South Pacific, has received a lot of interest in the health and wellness industry because of one of its key ingredients—fucoidan. Fucoidan has been the subject of literally hundreds of health-related studies. These studies show that fucoidan, a cell-building polysaccharide, plays an important role in many functions in the human body. Its long list of attributes include: anti-biotic, anti-coagulant, anti-carcinogenic, anti-inflammatory, anti-tumor, anti-viral, and the list goes on. In this book, you will learn more about fucoidan, where it comes from and what it does. In addition, you will find the scientific facts behind fucoidan's success as a health supplement in the more than 50 scientific references cited in this book alone. Go ahead, satisfy your curiosity about one of the most exciting health supplements available today.

<u>Qty.</u>	<u>Price</u>
(1).....	\$3.50
(100).....	\$1.75

**The Only Source for these Phenomenal Reference Materials is
VIDEO PLUS**

(800) 234-6488 / www.limumouitools.com



Enjoy the benefits of Limu Moui,
exclusively available in

ROYAL TONGAN LIMU™

a unique natural nectar with dramatic life enhancing health benefits!

Scientific study has shown that Limu Moui, a sea plant found off the Islands of Tonga, contains a veritable storehouse of natural minerals and vitamins, glyconutrients, amino acids and polysaccharides that can help support immune function.*

Limu Moui's main ingredient is **Fucoidan**, which according to prominent Japanese Researcher Dr. Kyosuke Owa is said to "contain the same healing antibodies found in mother's milk, providing essential amino acids and a balanced diet of minerals necessary to boost the immune system."

Dr. Jeffrey Bland, Nutritional Biochemist, says "**Fucoidan** has ... been found to inhibit lymphocyte binding to endothelial surfaces. This may result in a reduced risk of coronary heart disease ... It has also been shown that **Fucoidan** can enhance the immune response to certain viruses."

Call toll free 1-866-VI-TRIPS to learn more about
ROYAL TONGAN LIMU™ nectar and register to win
your own Virgin Islands Fantasy Vacation!

* These statements have not been evaluated by the Food and Drug Administration.
This product is not intended to diagnose, treat, cure or prevent any disease.

Exhibit B-5

Register Today to win your
Virgin Islands Fantasy Vacation
for two worth \$3,500

- 1) Call 1-866-VI-TRIPS
- 2) Get a personal confirmation
number from our Royal
Tongan Limu Operator
- 3) Complete registration,
add postage and mail

It's That
Easy!

Register To Win AN ALL EXPENSE PAID FANTASY VACATION FOR TWO TO THE VIRGIN ISLANDS

<input type="text"/>																								
Name (Last, First, Middle Initial)																								
<input type="text"/>																								
Address																								
<input type="text"/>										<input type="text"/>					<input type="text"/>									
City										State					Zip Code					Country				
<input type="text"/>										<input type="text"/>														
Phone Number										E-mail														
<input type="text"/>										<input type="text"/>														
Confirmation #										Referral #														

Call 1-866-VI-TRIPS

1-866-848-7477

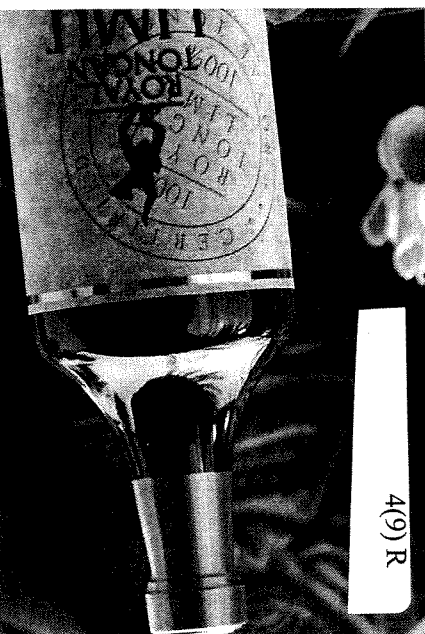
ROYAL
TONGAN
LIMU

Win a FREE Virgin Islands Fantasy Vacation!

Win a FREE

Royal Tongan Limu™

Listen to what Doctors are saying about the key ingredient in our new nectar!



4(9) R

Consumer Disclosure

The Virgin Islands Fantasy Vacation is presented by Dynamic Essentials (DE) Inc. ("DEI"). Forward all entries and inquiries to Virgin Islands Fantasy Vacation, P.O. Box 953099, Lake Mary, FL 32795-3099. Tel. 866-VI-TRIPS (866-848-7477). No purchase or payment of any kind is necessary to enter or win this sweepstakes. Odds of winning are not increased by making any type of purchase. Contestants are required to return the entry form to DEI with the confirmation number by first class mail. There are no telephone, or other expenses associated with winning.

The minimum guaranteed prize value of this trip to the Virgin Islands is \$3,500.00. It includes round-trip airfare from major US gateway cities to the US Virgin Islands, round-trip transfers between airport and hotel, hotel accommodations for two people for 6 nights / 7 days, mandatory hotel taxes and gratuities, where applicable, breakfast, lunch, and dinner daily, and non-alcoholic beverages. Winner is responsible for all other personal expenses, tips, sundry expenses, and taxes associated with winnings. No prize substitutions or cash redemptions allowed.

© 2001 Dynamic Essentials (DE) Inc. All Rights Reserved

PLEASE
AFFIX
CORRECT
POSTAGE

Virgin Islands Fantasy Vacation
P.O. Box 953099
Lake Mary, FL 32795-3099

Official Rules

1. Contest begins April 1, 2002 and runs through April 1, 2003. There are multiple prize phases. Each prize phase closes upon the entry of 5000 applicants into a drawing pool. A new drawing pool automatically begins once the previous pool closes with 5000 applicants. There will be one prize for each 5000 applicant pool. Prizes will be awarded within 30 days after the close of each pool. The final prize will be awarded on or before April 30, 2003.
2. Odds of winning a prize is 1 in 5000 per phase. Your overall odds of winning depend on the total number of contest phases run and the number of phases you enter. Only one entry per phase per person. If you enter during a phase, you may not enter for a subsequent phase until the first phase you entered has closed. Multiple entries in a single phase period will result in disqualification.
3. To enter the Virgin Islands Fantasy Vacation you must call DEI at 866-VI-TRIPS (866-848-7477), and provide the operator with the referral number on the letter you received notifying you of this contest. When you call, in addition to entering the contest, you will be given the opportunity to learn about the exciting opportunities and products offered by DEI. However, no purchase is necessary to enter the contest, and you do not increase your odds of winning by making a purchase.
4. Prize winners need not be present at the drawing to receive his or her prize. Winner will be notified by mail, and must claim their prize within 90 days of notification writing DEI with instructions on the dates of preferred travel. Winners must provide DEI with 90 days notice of intent to travel and at least 3 optional travel dates due to the allocated travel period, and must be available to travel on each of those dates. No travel is permitted from 1/19/2002 to 1/23/2002, 1/24/2002 to 1/27/2002, rain checks once travel is booked. Prizes not claimed within 90 days are forfeit and a second drawing will be held from the pool.
5. By entering the Virgin Islands Fantasy Vacation, you authorize DEI to use your name, picture, and any audio or videotape made of your award receipt for DEI's advertising and promotional purposes, and you waive all claims to remuneration for such use. To comply with certain state laws, DEI must disclose to persons making inquiries the names and cities in which the winners reside. Applicants to this contest will have no claim against DEI for such disclosure.
6. DEI respects your privacy - no contestant lists will be sold or distributed to any third party. If you do not wish to be contacted by DEI or any of its independent distributors in the future, you must submit written notice to DEI at 610 Creepe Executive Court, Suite 112, Lake Mary, FL 32746 specifying that you wish to be excluded from all future mailings or contact.
7. Persons under 21, DEI independent Distributors, persons employed by DEI, or their immediate families are not eligible to win. Contest is open to U.S. citizen residing in the Continental U.S., Alaska, and Hawaii. Contest void where prohibited. Winners must sign affidavit of eligibility.
8. Transportation, lodging, food and other miscellaneous services are provided by independent third party providers that are not related to DEI. All prizes are subject to the rules, regulations, and policies of each third party provider. DEI assumes no liability or fault for failure of performance, negligence, or any other act or omission of such third parties.

Item #20638 (6/

1 OFFICIAL TRANSCRIPT PROCEEDING

2 FEDERAL TRADE COMMISSION

3
4 MATTER NO. C-3593

5
6 TITLE NATURE'S BOUNTY

7
8 DATE RECORDED: MAY 19, 2003

9 TRANSCRIBED: FEBRUARY 27, 2004

10
11 PAGES 1 THROUGH 30

12
13
14
15
16 CD - DYNAMIC ESSENTIALS PRODUCT CALL

17 ROYAL TONGAN LIMU

18
19
20
21
22
23
24
25

For The Record, Inc.
Waldorf, Maryland
(301) 870-8025

Exhibit B-6

FEDERAL TRADE COMMISSION

I N D E X

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CD:

DEI Conference Call

PAGE:

3

FEDERAL TRADE COMMISSION

In the Matter of:)
Nature's Bounty) Matter No. C-3593
)
-----)

May 19, 2003

The following transcript was produced from a
live tape provided to For The Record, Inc. on February
24, 2004.

For The Record, Inc.
Waldorf, Maryland
(301) 870-8025

P R O C E E D I N G S

- - - - -

CD - DEI CONFERENCE CALL RE: ROYAL TONGAN LIMU

FEMALE OPERATOR: Please stand by, the meeting is about to begin. Ladies and gentlemen, welcome to this Dynamic Essentials Royal Tongan Limu weekly product call. At this time, it is my pleasure to introduce your host for the call, Hall of Fame member, Mr. Shannon Pardue.

SHANNON PARDUE: Thank you, Liz. Well, guys, I'd like to welcome all of you this evening. This is Shannon Pardue from Reston, Louisiana. I'm actually speaking to you tonight from the road. We're over in Atlantic City, North Carolina, actually. We had a great meeting over here this evening. Just tremendous things are happening over this new health discovery called Royal Tongan Limu that is sweeping the nation as we speak, and actually, sweeping the world. And what we're going to do tonight is we're going to take just a few minutes, share with you a brief history of this new discovery and then we'll let you hear from some people firsthand who have had some -- just some dramatic things happen in their lives and their family's lives, because that's what this is all about, guys, quality of life.

I think that most of us have realized that we're not in one of the healthiest nations in the world,

1 and actually, in actuality, we live in one of the
2 unhealthiest nations in the world. Our people are sick,
3 they're dying, they're looking for answers. And,
4 fortunately, I think that we're starting to realize that
5 a lot of the answers come from nature. You know, I don't
6 know how you believe tonight, but I believe the good Lord
7 put us here and I think He put on this earth what our
8 bodies need to function properly.

9 It wouldn't really make sense for us to be here
10 and not have the things on this earth our body's need.
11 It would be kind of like someone building an engine and
12 not having all the things that engine needed to run
13 properly at their disposal. So, I think everything's
14 here. I think we just have to find it. I think it's
15 been a tremendous blessing that we have been fortunate
16 enough to have our parent company discover Limu Moui and
17 now Royal Tongan Limu, which we're going to be discussing
18 this evening.

19 You see, this came about a couple of years ago.
20 Our parent company, NBTY, who's the largest American-
21 owned nutritional manufacturer in the world today,
22 started hearing about some people in the islands of Tonga
23 that seemed to be having exceptional health. Sent our
24 research team down and discovered for 3,000 years that
25 people in the islands of Tonga have gotten in dug-out

1 canoes, paddled out into the ocean and go down and gather
2 a sea vegetable that grows naturally off their coast they
3 call Limu Moui. And they attributed their health,
4 longevity and they kind of use it as a cure-all --
5 everything that they had that ails them, they believe
6 that Limu would take care of it.

7 If they had a toothache, they'd pack the tooth
8 with it, a skin problem, they'll make a (inaudible) and
9 put on there and they ingested it -- they ate it
10 internally as a staple of their diet every day. So, no
11 matter what you had that was wrong with you, they
12 believed more Limu would take care of it.

13 Well, Rob Silverman, being intrigued with the
14 people of Tonga and their health, brought some of this
15 back from the islands of Tonga, gave it to the research
16 team at NBTY, our parent company, who, by the way,
17 happens to be the largest American-owned nutritional
18 manufacturer in the world today, again, and they're the
19 big boys out there. For 30 years, they've been
20 researching health. And after a couple of weeks
21 researching this, they became very excited about the
22 potential health benefits of Limu Moui. In particular, a
23 substance that was -- that naturally occurs in the Limu
24 Moui called Fucoidan.

25 What the research team discovered was that some

1 of the top researchers around the world have already done
2 over 500 clinical studies now on this substance Fucoidan.
3 And Fucoidan, basically for -- I guess to put it simply,
4 basically brings a body back into balance. It helps
5 build the immune system. They've likened it to what
6 mother's milk does for a newborn child's immune system.

7 I think we all know that our key to good health
8 and longevity and quality of life is a strong and healthy
9 immune system. Our good friend, Dr. Ron Schuler
10 (phonetic) stated recently, he said, Shannon, he said, we
11 all have cancer in our bodies. He said, the only thing
12 between the cancer in your body running rampant and it
13 not is your immune system. I don't know about you guys
14 but that one statement alone made me want to make sure my
15 immune system was as strong as it possibly could be.

16 So, a little over two years ago, we found out
17 about this substance, Limu Moui. We started looking at
18 the research ourselves and I was kind of in disbelief at
19 first. Fifty-seven disease conditions were listed
20 through the research that the Fucoidan had a positive
21 impact on. Every disease we face today -- I mean, think
22 about it for just a moment. How many of you know someone
23 in your immediate family or circle of friends that has --
24 suffering with cancer right now? How about diabetes?
25 How about high blood pressure? How about fibromyalgia?

1 Arthritis? You know, we're all suffering with those
2 things in our families.

3 When I looked at all the research studies
4 showing 57 diseases, my thoughts were, you know, if this
5 would only affect a couple of these things in a positive
6 way, everyone needs to know about it. And a little over
7 24 months ago, NBTY released Royal Tongan Limu in a
8 liquid nectar. You'll be glad to know you don't have to
9 swallow handfuls of pills any longer, and it tastes kind
10 of like kiwi. So, you know, that's something that's very
11 important because even the children and your
12 grandchildren will drink Limu -- Limu Moui or Royal
13 Tongan Limu. And we started drinking it. And, guys, the
14 results have been nothing short of just astounding over
15 the last 24 months.

16 Rachette and I have been traveling the country
17 meeting people all over the country that are taking Royal
18 Tongan Limu and just seeing dramatic changes in the
19 people -- the people's quality of life, and that's what
20 this is all about is quality of life.

21 What I want to do tonight is I want to take a
22 few minutes and just -- you know, I think it's more
23 important for you to hear personally from some people
24 that are already taking Royal Tongan Limu, because we
25 could talk about research all night, but the reality is,

1 is this working for people and are people getting
2 results? So, I want you to hear from some live people
3 around the country.

4 We're going to start off tonight, I was up in
5 New Jersey a couple of days ago with a good friend of
6 ours, Ms. Marilyn Gotschal (phonetic). And, Marilyn, I'd
7 like -- Marilyn, are you there, first of all?

8 MARILYN GOTSCHAL: Yes, I am, Shannon.

9 SHANNON PARDUE: Very good. Good to have you.
10 And I'd like you, Marilyn, to just take a few moments and
11 share with everyone kind of what was going on with you
12 over the last couple of years physically and what's
13 happened over the last couple of months since you've been
14 with Royal Tongan Limu.

15 MARILYN GOTSCHAL: Sure, Shannon. In the
16 beginning, I was taking -- before the Limu, I was taking
17 about 25 nutritional supplement capsules a day, and I was
18 still getting my arthritis pain off and on. It just
19 wasn't doing the trick for me. My memory was starting to
20 go. The last three years my mother had Alzheimer's
21 Disease and I was worried that I did have the start of
22 it, also. I couldn't recall names -- to remember names
23 to -- of people to say and I couldn't remember the names
24 of different items of things that I was talking -- I'd be
25 having a conversation and I couldn't remember the name of

1 the item that I was trying to tell people about. It was
2 really getting discouraging, very discouraging.

3 SHANNON PARDUE: I'm sure, yes.

4 MARILYN GOTSCHAL: And then in November -- on
5 November 3rd, I started on the Limu. I was introduced to
6 it by a good friend, Tony, up here in New Jersey, and I
7 was taking two ounces in the morning and two ounces in
8 the evening. And with -- in one week, Shannon, my pain
9 from arthritis was completely gone. Now, ever since
10 then, I've had no pain, arthritis pain. I've had a
11 backache once and then a little bit of an ache one other
12 time for like a couple hours, but that's it. The whole
13 thing is gone.

14 Now, it took three-and-a-half to four months
15 for my memory. I started to think that my memory's
16 coming back and it was. Within that four months, my
17 memory came back and I can recall names of people and
18 everything. In fact, my friends are laughing because I'm
19 helping them out remembering names of different things.
20 They can't remember it, so I do it for them.

21 SHANNON PARDUE: (Inaudible).

22 MARILYN GOTSCHAL: Yeah, Shannon, it's great,
23 let me tell you. And there's other things that have
24 happened to me. I no longer take my vitamins. My
25 pressure in my eyes has come down some and I go back

1 tomorrow for another check-up on my eyes, and my
2 cholesterol is starting to come down and the blood sugar
3 that was slightly elevated is now normal.

4 SHANNON PARDUE: And, Marilyn, this has all
5 happened in just a couple of months now?

6 MARILYN GOTSCHAL: Yes, yes, since November.

7 SHANNON PARDUE: Wonderful.

8 MARILYN GOTSCHAL: Yes.

9 SHANNON PARDUE: And the beautiful part is,
10 just imagine what's going to happen in the future if you
11 continue with Royal Tongan Limu.

12 MARILYN GOTSCHAL: Yes, absolutely, Shannon.
13 Everybody should be on this, believe me.

14 SHANNON PARDUE: Well, Marilyn, thank you so
15 much for taking some time to share with us this evening.
16 It was good seeing you the other day.

17 MARILYN GOTSCHAL: Yeah, same here, Shannon.
18 Thank you.

19 SHANNON PARDUE: Take care, Marilyn.

20 MARILYN GOTSCHAL: Okay.

21 SHANNON PARDUE: Well, guys, we're going to
22 head down to Texas, actually, down in Houston. We've got
23 Ms. Madeline Riggins on. Ms. Madeline, are you there?

24 MADELINE RIGGINS: Yes, I am, Shannon.

25 SHANNON PARDUE: Great, Ms. Madeline. Share

1 with us what's been going on with your health over the
2 last couple of years and what's happened since you've
3 been with Royal Tongan Limu.

4 MADELINE RIGGINS: Well, Shannon, when I was
5 introduced to Royal Tongan Limu, I was faced with several
6 health challenges, such as high cholesterol, which is
7 down now. My sinus infections I had pretty bad, I'm not
8 bothered with those anymore. I had acid reflux so bad I
9 could not sleep at night and then I had migraines so bad
10 that I didn't want people to even touch my bed once I was
11 lying on the bed. It was just severe.

12 But since I've been on the Royal Tongan Limu,
13 which I was introduced to in October, I have had no
14 problems with that. I've seen tremendous results with
15 that.

16 Since then, back in February of this year, I
17 had to have a corneal transplant in one of my eyes, and
18 the ophthalmologist told me that this would be an
19 expensive healing process, anywhere from six to eight
20 months, if not longer, for that one eye. Well, I said,
21 no, I've got to do something about this. But I did as
22 the ophthalmologist told me to do and back in March, I
23 decided I would go to work and use Limu as an eye wash.
24 So, I purchased some sterile eye wash and began to put
25 the Limu in it. I washed my eyes once or twice a day. I

1 went to the ophthalmologist a couple of weeks ago and he
2 told me he is seeing perfect healing lines in that eye
3 and it's only been about three or four months.

4 SHANNON PARDUE: Wonderful, wonderful,
5 Madeline.

6 MADELINE RIGGINS: And I have seen tremendous
7 results and I --

8 SHANNON PARDUE: Now, Madeline, with your
9 migraines, I know a lot of people around the country
10 suffer from migraines, what -- I guess what results have
11 you had with the migraines?

12 MADELINE RIGGINS: I haven't had those
13 migraines since I've been on the Limu.

14 SHANNON PARDUE: So, you're not having any
15 migraines any longer?

16 MADELINE RIGGINS: No, I haven't had a one.

17 SHANNON PARDUE: Wonderful.

18 MADELINE RIGGINS: Not a one.

19 SHANNON PARDUE: Wonderful. So, your
20 migraines, your sinuses, your eyesight, no acid reflux.

21 MADELINE RIGGINS: Uh-huh. And cholesterol.
22 Cholesterol has definitely gone down.

23 SHANNON PARDUE: Wonderful. So, you're a new
24 woman, huh, Madeline?

25 MADELINE RIGGINS: Oh, yes.

1 SHANNON PARDUE: (Laughter). Very good.

2 MADELINE RIGGINS: Totally different. Totally
3 different.

4 SHANNON PARDUE: Thank you so much for sharing
5 with us today. Now, aren't you glad someone shared Royal
6 Tongan Limu with you?

7 MADELINE RIGGINS: Yes, I am, and I can never
8 thank them. I don't intend to be without Royal Tongan
9 Limu.

10 SHANNON PARDUE: Wonderful. Thank you so much
11 for sharing with us this evening.

12 MADELINE RIGGINS: Okay.

13 SHANNON PARDUE: All right, guys, well, we're
14 going to stay in Texas tonight for another few moments.
15 We're going over to Beaumont. We've got Ms. Renee
16 Friddle (phonetic) on the line. Ms. Renee?

17 RENEE FRIDDLE: Hello.

18 SHANNON PARDUE: Hello, Renee.

19 RENEE FRIDDLE: Can y'all hear me?

20 SHANNON PARDUE: We can hear you great. Now,
21 take a moment and share with us kind of what's been going
22 on with you the last couple of years.

23 RENEE FRIDDLE: Well, I will definitely try to
24 keep it brief. I had gotten to a point, literally, where
25 I had given up. I had spent off and on about 10 years in

1 a wheelchair, which ended up leading to hip surgery. I
2 was still in the wheelchair because it didn't work. And
3 then a friend introduced me to Sally Holly (phonetic) in
4 Louisiana and I bought a bottle from her. I think it was
5 in November. But I wanted to tell you between -- what I
6 had was degenerative disc disease, degenerative joint
7 disease, cystic kidney disease, of course, fibromyalgia
8 and chronic fatigue.

9 SHANNON PARDUE: Hmm.

10 RENEE FRIDDLE: And that's just the high
11 points.

12 SHANNON PARDUE: Gracious, gracious.

13 RENEE FRIDDLE: I was on 28 pills three times a
14 day. And that's been my life, you know. So, I pretty
15 well resided -- I was -- I mean, I'm 40, I'm not old.
16 But anyway, I bought a bottle from Sally and I tried it
17 and within a month realized that my chronic fatigue was
18 under control. And then from there, it just started
19 going totally excellent. I have not been in my
20 wheelchair since like mid-November. I have very little
21 pain, if even pain at all sometimes, which isn't very
22 rare. I mean, if I get out and like -- I got out and
23 raked the yard, which I hadn't done in 10 years.

24 SHANNON PARDUE: Right, yeah.

25 RENEE FRIDDLE: You know, I hurt.

1 SHANNON PARDUE: You could expect a little pain
2 from that absolutely.

3 RENEE FRIDDLE: But that was worth it, you
4 know. My cholesterol dropped over 50 points.

5 SHANNON PARDUE: Wow.

6 RENEE FRIDDLE: I did -- my biggest glory so
7 far I guess you could say that Limu has done for me is I
8 went in for a check-up and they did an MRI, you know, the
9 whole body thing where they go in to look at my kidneys
10 and my bones and everything else, and they could not find
11 any cysts in my kidneys.

12 SHANNON PARDUE: Wow.

13 RENEE FRIDDLE: They're gone.

14 SHANNON PARDUE: Incredible.

15 RENEE FRIDDLE: So, it's been wonderful,
16 wonderful stuff. I did want to add in, when my daughter
17 had her tonsillectomy, I mixed it with pineapple and
18 orange juice and made popsicles and that's what she
19 sucked on for days. It was wonderful.

20 SHANNON PARDUE: Excellent. Great idea. Great
21 idea. So, Renee, how much Limu are you taking daily?

22 RENEE FRIDDLE: I take an ounce three times a
23 day.

24 SHANNON PARDUE: Three ounces a day.

25 RENEE FRIDDLE: Now, when I started off, I was

1 doing like about three or four ounces several times a
2 day.

3 SHANNON PARDUE: Right, yes, yes, flooding your
4 system, right.

5 RENEE FRIDDLE: Yeah. Yeah, you know, just
6 enough to build up. And when I realized like, hey, I
7 mean, even my IBS has been non-active.

8 SHANNON PARDUE: Wow, incredible. Incredible,
9 Renee.

10 RENEE FRIDDLE: I have a life now.

11 SHANNON PARDUE: Wonderful, wonderful. And,
12 Renee, that's what this is about, absolutely just help
13 people get their quality of life back.

14 RENEE FRIDDLE: Yes, it is.

15 SHANNON PARDUE: I'm so glad that you've had
16 such dramatic results with Royal Tongan Limu.

17 RENEE FRIDDLE: It's been --

18 SHANNON PARDUE: I certainly am.

19 RENEE FRIDDLE: -- wonderful.

20 SHANNON PARDUE: Thank you so much for taking
21 some time to share with us this evening.

22 RENEE FRIDDLE: Thank you.

23 SHANNON PARDUE: We appreciate you. And we
24 want to continue keeping up with your progress --

25 RENEE FRIDDLE: Oh, okay.

1 SHANNON PARDUE: -- as you continue forward.
2 Thank you very much.

3 RENEE FRIDDLE: Definitely.

4 SHANNON PARDUE: Well, guys, I think that now
5 you're getting an idea of why we're so excited about
6 Royal Tongan Limu. We're truly changing the quality of
7 people's lives. You know, Royal Tongan Limu is not a
8 miracle cure, it's not a miracle drug, but it's simply
9 giving the body what the body needs and I think that the
10 good Lord intended the body to work correctly, and if
11 it's got what it needs, the body can do some amazing
12 things for itself, as you're hearing on the line this
13 evening.

14 And, guys, we're very, very fortunate tonight.
15 We've got a good friend from Canada on the line, Ms.
16 Susan Sly (phonetic). Susan is a certified nutritional
17 consultant. She's a former Professor of Nutrition on the
18 college level, former professional athlete, and has been
19 over -- in health and fitness for over 10 -- 12 years now
20 actually and is a certified professional trainer and
21 coach. So, very well-qualified to talk about the health
22 benefits of Royal Tongan Limu and she's very, very
23 knowledgeable. So, we've asked Susan to come on this
24 evening for a few minutes.

25 And, Susan, first of all, are you here with us?

1 SUSAN SLY: I am, Shannon.

2 SHANNON PARDUE: Good to have you, Susan.

3 SUSAN SLY: It's good to be here.

4 SHANNON PARDUE: If you would, please, take a
5 few moments and I know we've talked -- you know, we
6 always talk about Royal Tongan Limu and people that are
7 having health concerns, which are generally the first
8 people we think about. But, you know, what would you say
9 to someone -- you know, how -- what would you say to
10 people from the standpoint of, you know, if you're
11 healthy and you think you're healthy, why do you need
12 Royal Tongan Limu?

13 SUSAN SLY: Thank you, Shannon. That's an
14 excellent point. You know, any of the ladies on this
15 call this evening, I bet they could all tell you that
16 their disease states did not just come on overnight.
17 They weren't perfectly healthy on Monday and woke up
18 Tuesday morning and they were in this state. And the
19 thing is, with our bodies, every single day, we are
20 facing stresses, and let's take a look at that. If
21 anyone takes an apple, for instance, and they cut it open
22 and they leave it on the counter, what's going to happen
23 is that apple is going to turn brown and that is
24 oxidation. When steel, for instance, when it rusts, that
25 is oxidation.

1 Our body is oxidating at a rate that is so
2 incredibly fast that it is very challenging to keep up
3 with it. What happens is every time we breathe, when we
4 exercise or we consume foods, we are going to take in
5 free radicals and they are going to cause damage in our
6 bodies.

7 And as Dr. Schuler was saying, you know,
8 basically, many people are going to get cancer. The
9 question is, what are you going to do to prevent it? And
10 it's very tough when you're in your, say, 20s or 30s or
11 40s or 50s, and saying, well, I'm perfectly healthy, I
12 don't need to take this. But something like heart
13 disease doesn't happen because you ate one steak. It
14 happens because you consumed things over periods of time.

15 SHANNON PARDUE: Absolutely.

16 SUSAN SLY: So, what we have to look at is
17 prevention. And the other thing I say to people is, you
18 know, let's liken the human body to a bucket and some of
19 us -- there's seven billion people on this earth. Some
20 of us have a bucket that is completely empty. That means
21 we're nutrient deficient. Some of us come in and it's
22 half full or two-thirds full and we're not as nutrient
23 deficient. Every one of us walking this planet can
24 improve our nutritional, there's no question.

25 You know, hundreds of years ago we could eat an

1 apple -- for instance, I'll use the apple again as an
2 analogy -- we could eat that and get many nutrients out
3 of it. In fact, in an apple, if I printed out all the
4 ingredients in an apple, it would be 22 pages long,
5 Shannon.

6 SHANNON PARDUE: Wow.

7 SUSAN SLY: The point of that is, with our food
8 supply today, it's just not there. And people cannot --
9 and I emphasize this, you cannot get complete nutrition
10 from your food, you are going to have to supplement. The
11 notion that you can supplement and take a pill, it's a
12 great notion and it is very convenient. But less than 90
13 percent -- more than 90 percent of that pill gets washed
14 away. You do not absorb it. So, you have to look at how
15 can you get this nutrition from a food source.

16 And what got me really excited about Limu was
17 it is -- that it is nutrition from a food source and it's
18 suspended in a liquid medium and the liquid makes it more
19 bio-available.

20 Now, why that's important, Shannon, is that
21 when you are taking in a liquid that is loaded with
22 antioxidants, as this is, you're giving your body the
23 tools to fight free radical damage. Now, if you're,
24 let's say, a healthy man in your 30s and you're saying,
25 well, I'm pretty healthy and, you know, I sleep and I

1 work out, that's precisely why you should be taking Limu
2 because you're not going to get a perfect night's sleep
3 every night. You're not going to have the perfect diet
4 every day. Just the fact that you are working out means
5 every single time you do work out, you do tear your
6 muscles down, you do get oxidative stress, and you need
7 to put the building blocks back in to make yourself
8 completely healthy. And that is why people need to be
9 thinking about how healthy do you want to be 20 years
10 down the road, 30 years down the road or even 5 years
11 down the road.

12 SHANNON PARDUE: Susan, one of my favorite
13 mentors is Jim Rohn (phonetic) and Jim Rohn said that,
14 you know, an apple a day --

15 (Skip in CD)

16 SHANNON PARDUE: -- an apple a day keeps the
17 doctor away and he said, you know, what if that's true?
18 You know, what if it was just as simple as doing
19 something every day consistently would help our bodies
20 maintain optimal health? Do you find that the Royal
21 Tongan Limu is a simple -- I don't want to say solution,
22 but something that people -- it's much easier for people
23 to stay with the program, so to speak, than the
24 traditional nutritional regimen?

25 SUSAN SLY: Exactly, Shannon. And it is a

1 whole food. It's kept in the fridge. That's very
2 important. It is fresh. It's harvested from seaweed,
3 which has tremendous nutritional value.

4 There's a study that I was looking at recently
5 out of Brazil and they have overwhelming evidence
6 supporting seaweed and its ability to fight things like
7 allergies, asthma, cancer, it's just tremendous. You
8 mentioned over 500 clinical studies and these are
9 clinical studies on Fucoidan and that's huge. There are
10 drugs out there with less than five clinical studies and
11 people are taking them. I mean --

12 SHANNON PARDUE: Right, yeah.

13 SUSAN SLY: -- this is tremendous. The other
14 thing we have here with this product is there is
15 overwhelming clinical evidence for the different
16 components. There's overwhelming clinical evidence for
17 Fucoidan. There's overwhelming clinical evidence for
18 Vitamin C, for instance, for minerals. Now, what you
19 have in Limu is this unique combination of all of these
20 things, including body constituent minerals, like
21 calcium, in a suspension, in a liquid that is so easy to
22 take and it is so bio-available. And it just staggers me
23 as to why people wouldn't take it, Shannon, to be honest.
24 And I think --

25 SHANNON PARDUE: Absolutely.

1 SUSAN SLY: You know, people need to be taking
2 this right away. It's not something they should put off
3 for a month from now, because are you telling me that in
4 the next month you aren't going to breathe? Of course
5 you are.

6 SHANNON PARDUE: That's right. That's right.

7 SUSAN SLY: And every time you take that
8 breath, you are going to get oxidative stress. So,
9 people need to be taking this, they need to be taking it
10 now. And it is a regimen. It's part of -- it's like
11 brushing your teeth. You know, you brush your teeth to
12 prevent gum disease. You take Limu to prevent oxidative
13 stress, to prevent things like cancer or fibromyalgia or
14 MS, all of the things.

15 Is this a miracle cure? As you mentioned, no,
16 it is not. But if you knew -- if you could take a time
17 machine into the future 30 years and you saw yourself
18 with cancer, wouldn't you do something now that could
19 prevent that picture from happening?

20 SHANNON PARDUE: Absolutely. Just the hope of
21 something, Susan, you know?

22 SUSAN SLY: Exactly, exactly, Shannon.

23 SHANNON PARDUE: Absolutely, absolutely. Well,
24 Susan, what -- in closing, what would you say to people
25 that ask, you know, should my children or grandchildren

1 be taking Limu?

2 SUSAN SLY: That's an excellent point, Shannon.
3 You know, if you don't mind, I'm just going to quickly
4 cite another study that came out of Japan, and it was
5 talking about oxidative stress in children and their
6 diminished anti-oxidant defenses. And essentially,
7 children are very nutrient deficient. As a parent of two
8 young children, I have a one-year-old and a six-year-old,
9 I know nutrition on the go is not always the healthiest
10 thing and my children, you know, they don't want to
11 always choose the healthiest thing.

12 SHANNON PARDUE: Right.

13 SUSAN SLY: This is one way to ensure your
14 children are going to get this. It's also allergy
15 season. If your children or if yourself or someone you
16 know and care about is suffering from allergies, Limu has
17 wonderful things in it like magnesium, which is a vaso-
18 dilater, which opens up the respiratory system. It has
19 Fucoidan, which is an anti-inflammatory. Everyone should
20 be taking this.

21 Shannon, my son has been on Limu since he was
22 two weeks old and my daughter has been on Limu since she
23 was five. And I wish -- you know, I wish I could back up
24 time, I guess, because in -- when my daughter was two,
25 she was diagnosed with asthma, and since she's been on

1 Limu, we have not had a problem. So, I've never had to
2 give her, since she's been on Limu, an inhaler, which is
3 just a tremendous gift.

4 So, people need to get their whole families on
5 this. It is safe. It is a whole food. It is seaweed
6 and we -- you know, we -- you know, my kids love to take
7 it. My baby takes it straight. It has a really nice
8 taste to it. Everyone should be taking it.

9 SHANNON PARDUE: Absolutely. And that's the
10 beauty of this. It's so easy for kids to take because it
11 doesn't taste bad and you can mix it in the juice and
12 it's easy to keep people on it. Obviously, that is a
13 tremendous benefit, Susan.

14 SUSAN SLY: Absolutely, Shannon.

15 SHANNON PARDUE: Well, Susan, I appreciate you
16 taking some time out of your busy schedule to share with
17 everyone this evening. Thank you so much.

18 SUSAN SLY: Well, thank you for having me.

19 SHANNON PARDUE: And, Marilyn and Madeline, I
20 want to thank all of you ladies for sharing this evening
21 with us. And, guys, again, I know that now -- you know,
22 I don't believe anything happens by chance. I think
23 you're on the call tonight for a reason. Someone cared
24 enough about you to give you a phone call and say there's
25 something you need to know about.

1 You know, there's one -- really one thing that
2 sets us apart from every other form of life on this earth
3 today and that's the ability to choose. We have the
4 ability to make a decision. And if we don't like how
5 things are, we can make the decision to change them. I
6 always ask people, are you as healthy as you want to be?
7 You know, if you're not, maybe it's time to make a
8 decision and do something different, you know, and
9 encourage your family to do something different.

10 And the beautiful part of Royal Tongan Limu,
11 although we need to be exercising and all those other
12 things out there, this is something that, as Susan said,
13 is so simple. Walk by your refrigerator every morning,
14 drink it. Walk by your refrigerator every evening and
15 drink it. Put it in front of the milk. Don't forget,
16 drink it every day, at least twice a day and you'll be
17 literally amazed, I believe, in the next -- in the coming
18 months and the coming years about quality of life and
19 health.

20 If just one simple thing every day could
21 possibly make a difference, why in the world wouldn't we
22 give it a shot? So, I encourage all of you to get with
23 whoever put you on the call tonight and get you and your
24 family started on Royal Tongan Limu. Whoever put you on
25 the share can share how to get it at wholesale. And make

1 sure to ask them how you can get it even at a reduced
2 price or even get it at no cost out of pocket by simply
3 helping us get the word out about Royal Tongan Limu,
4 something you're going to do naturally anyway.

5 I'm telling you this, guys, you need to be
6 taking Royal Tongan Limu every day and we need to be
7 sharing it every day, because just as those people you
8 heard on the call tonight had dramatic results, what if
9 someone hadn't shared it with those people? And we all
10 have people we know that are suffering from similar
11 conditions as these people on the call tonight.

12 So, the question I'm going to leave you with is
13 this, are you going to share Royal Tongan Limu with the
14 people you care most about or are you going to hope that
15 someone else come along -- comes along and does? You
16 know, let's don't keep our people suffering any longer
17 than need be. If Royal Tongan Limu could possibly make a
18 difference, I think we owe it to those people we care
19 most about to at least share the information with them.

20 We appreciate you all being on the call this
21 evening with us. I encourage you to get you and your
22 family started on Royal Tongan Limu and I encourage you
23 to share it with two a day every day. Make a difference
24 in the quality of other people's lives around the
25 country.

1 God bless each and every one of you. Have a
2 great week and we look forward to talking to you next
3 week on the call. Goodnight, everyone.

4 (The conference call was concluded.)
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T I O N O F T Y P I S T

MATTER NUMBER: C3593CASE TITLE: NATURE'S BOUNTYTAPING DATE: MAY 19, 2003TRANSCRIPTION DATE: FEBRUARY 13, 2004

I HEREBY CERTIFY that the transcript contained herein is a full and accurate transcript of the tapes transcribed by me on the above cause before the FEDERAL TRADE COMMISSION to the best of my knowledge and belief.

DATED: FEBRUARY 13, 2004

ELIZABETH M. FARRELL

C E R T I F I C A T I O N O F P R O O F R E A D E R

I HEREBY CERTIFY that I proofread the transcript for accuracy in spelling, hyphenation, punctuation and format.

KATHY J. DE MENT